European Aviation Safety Agency

Comment-Response Document 2015-08

Task force for the review of Part-M for General Aviation (PHASE II)

CRD TO NPA 2015-08 — RMT.0547 — 13.4.2016

RELATED Opinion No 05/2016

EXECUTIVE SUMMARY

This Comment-Response Document (CRD) contains the comments received on NPA 2015-08 and the responses, or a summary thereof, provided thereto by the Agency.

Based on the comments and responses, Opinion No 05/2016 was developed.

For information, the Agency publishes the draft acceptable means of compliance (AMC)/guidance material (GM) attached to this CRD. These AMC/GM will be further developed by the Agency in consultation with the Task Force for the review of Part-M for General Aviation (hereinafter referred to as the 'Part-M GA Task Force') before issuing a final decision, to which the final AMC/GM will be annexed. This decision will be issued once the comitology process for the adoption of the implementing rules (IRs) proposed in the related Opinion No 05/2016 is finalised and the final IRs are adopted by the European Commission.

Applicability		Process map	
Affected regulations and decisions:	— Regulation (EU) No 1321/2014 — ED Decision No 2015/029/R	Terms of reference (ToR), Issue 1	2.7.2015
		Concept paper (CP):	No
		Rulemaking group (RMG):	No
Affected stakeholders:	Lighter end of the General Aviation (GA) community, including aircraft owners/operators; independent certifying staff; maintenance organisations; continuing-airworthiness management organisations (CAMOs); and competent authorities (CAs) overseeing these aircraft and activities	Regulatory impact assessment (RIA) type:	Light
		Technical consultation during notice of proposed amendement (NPA) drafting:	Yes (Task Force)
		NPA publication date:	9.7.2015
		NPA consultation duration:	3 months
		Review group (RG):	No
		Focused consultation:	Yes (task force and special thematic advisory group (TAG) meeting)
Driver/origin:	Efficiency/proportionality	Opinion publication date:	13.4.2016
Reference:	N/a	Decision expected publication date:	Once the IRs rules are adopted by the European Commission

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1. Procedural information

1.1. The rule development procedure

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed this CRD in line with Regulation (EC) No 216/2008[1] (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure[2].

This rulemaking activity is included in the Agency's 5-year Rulemaking Programme, under RMT.0547. The scope and timescales of the task were defined in the related ToR.

The draft IRs and the related AMC/GM have been developed by the Agency based on the input of Part-M GA Task Force as well as the input of the national aviation authorities (NAAs) during a special P&M TAG meeting on 'Light Part-M' on 12 November 2015. All interested parties were consulted through NPA 2015-08[3]. Nearly 700 comments were received from interested parties, including individuals, aircraft owners/operators, flying-sports clubs/associations, independent certifying staff, maintenance organisations, CAMOs, manufacturers and CAs.

The text of this CRD has been developed by the Agency based on the input of the Part-M GA Task Force as well as the input of the NAAs during said special P&M TAG meeting.

The process map on the title page contains the major milestones of this rulemaking activity.

1.2. The structure of this CRD and related documents

Chapter 3 of this CRD contains the resulting rule text (AMC/GM to Part-ML). A summary of comments and responses thereto is provided in Chapter 2 (explanatory note (EN)) to the related Opinion No 05/2016[4], and the full set of individual comments in Chapter 4 of this CRD.

1.3. The next steps in the procedure

The Agency published this CRD in parallel with Opinion No 05/2016, which contains the proposed changes to Regulation (EU) No 1321/2014. This Opinion is addressed to the European Commission to be used as technical basis in order to prepare a legislative proposal.

The final decision, to which the related AMC/GM will be annexed, will be published by the Agency once the European Commission has adopted the related IRs. Until that time, the Agency will further develop, in consultation with the Part-M GA Task Force, the AMC/GM presented in this CRD.

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1 Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1)

2 The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such a process has been adopted by the Agency's Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 18-2015 of 15 December 2015 concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material.

3 In accordance with Article 52 of the Basic Regulation and Articles 6(3) and 7 of the Rulemaking Procedure.

4 http://easa.europa.eu/document-library/opinions

2. Summary of comments and responses

The summary of comments and responses thereto is contained in the EN to Opinion No 05/2016.

3. Draft AMC/GM

AMC/GM to new Annex Vb (Part-ML) to Regulation (EU) No 1321/2014 have been developed as follows:

AMC ML.1 General

A competent authority may be a ministry, a national aviation authority or any aviation body designated by the Member State and located within that Member State. A Member State may designate more than one competent authority to cover different areas of responsibility, as long as the designation decision contains a list of the competencies of each authority and there is only one competent authority responsible for each given area of responsibility.

GM ML.A.201(a) Responsibilities

According to ML.A.201(a), the owner (as defined in ML.1) is responsible for the airworthiness of the aircraft.

In the case of an aircraft operated under Part-NCO, Part-ML allows the following:

— The owner may manage the continuing airworthiness of the aircraft under its own responsibility, with no need for involvement of a CAMO or CAO. Nevertheless, the owner may still choose to contract such an organisation.

— For the aircraft maintenance programme (AMP):

- if the conditions of ML.A.302(e) are met, the content of the AMP is the one contained in ML.A.302(e) and there is no need to produce an AMP document;
- if the conditions of ML.A.302(e) are not met, an AMP document has to be produced:
  - o if the owner manages the continuing airworthiness of the aircraft under their own responsibility, the owner has to declare the AMP; deviations from the DAH's recommendations are possible, with no need for justification; and
  - o if the owner has contracted a CAMO or CAO, this organisation has to approve the AMP; deviations from the DAH's recommendations are possible, but the organisation has to keep a record of the justifications and provide a copy of them to the owner; and
- the template contained in AMC ML.A.302 may be used to develop the AMP.

— Maintenance may be performed by the pilot-owner and independent certifying staff. Involvement of maintenance organisations is only mandatory for overhaul of certain components.

— Maintenance organisations and independent certifying staff may perform the airworthiness review (issuing the ARC) together with the 100-h/annual inspection.

In the case of an aircraft not operated under Part-NCO, Part-ML allows the following:

— The owner must contract a CAMO or CAO in order to manage the continuing airworthiness of the aircraft.

— For the maintenance programme (AMP):

- if the conditions of ML.A.302(e) are met, the content of the AMP is the one contained in ML.A.302(e) and there is no need to produce an AMP document;
- if the conditions of ML.A.302(e) are not met, an AMP document has to be produced and approved by the contracted CAMO or CAO; deviations to the DAH's recommendations are possible, but the organisation has to keep a record of the justifications and provide a copy of them to the owner; and
- the template contained in AMC ML.A.302 may be used to develop the AMP.

— Maintenance has to be performed by a maintenance organisation. This organisation may perform the airworthiness review (issuing the ARC) together with the 100-h/annual inspection.

GM ML.A.201(e) Responsibilities

If an owner decides not to make a contract in accordance with ML.A.201(e), the owner is fully responsible for the proper accomplishment of the corresponding continuing-airworthiness management tasks. As a consequence, it is recommended that the owner properly self-assesses their own competence to accomplish those tasks or otherwise seek the proper expertise.

AMC ML.A.302 Aircraft maintenance programme

— The aircraft should only be maintained according to one maintenance programme at a given point in time. Where an owner wishes to change from one programme to another because of a change in the type of operation, a transfer check or inspection may need to be performed to implement the change.

— The maintenance programme may take the format of the standard template provided below (EASA Form AMP). This maintenance programme may include several aircraft registrations as long as the maintenance requirements for each registration are clear.

— During the annual review of the maintenance programme, the following should be taken into consideration:

- the results of the maintenance performed during that year, which may reveal that the current maintenance programme is not adequate;
- the results of the airworthiness review performed on the aircraft, which may reveal that the current maintenance programme is not adequate;
- revisions introduced on the documents affecting the programme basis, such as the ML.A.302(d) minimum inspection programme (MIP) or the design approval holder (DAH) data; and

- applicable mandatory requirements for compliance with Part-21, such as airworthiness directives (ADs), airworthiness limitations, certification maintenance requirements and specific maintenance requirements contained in the type certificate data sheet (TCDS).

For the purpose of reviewing the results of the maintenance performed during the last 12 months, the airworthiness review staff should request from the owner/CAMO/CAO the records of all the maintenance performed during that year, including unscheduled maintenance.

When reviewing the results of the maintenance performed during that year and the results of the airworthiness review, attention should be paid as to whether the defects found may have been prevented by introducing in the maintenance programme certain DAH's recommendations which were initially disregarded by the owner.

<table>
<tr><th colspan="5">Part-ML aircraft maintenance programme (AMP)</th></tr>
<tr><th colspan="5">Aircraft identification</th></tr>
<tr><td>1</td><td colspan="2">Registration(s):</td><td>Type:</td><td>Serial no(s):</td></tr>
<tr><th colspan="5">Basis for the maintenance programme</th></tr>
<tr><td>2</td><td colspan="2">Design approval holder (DAH) maintenance data ☐
(Complete Section 3 below)</td><td colspan="2">Minimum inspection programme (MIP) as detailed in the latest revision of AMC ML.A.302(d) ☐
Other minimum inspection programme (MIP) complying with ML.A.302(d) ☐
(List the tasks in Appendix A to this AMP)</td></tr>
<tr><th colspan="5">Design approval holder (DAH) maintenance data (not applicable if using minimum inspection programmes (MIPs))</th></tr>
<tr><td>3</td><td colspan="2">Equipment manufacturer and type</td><td colspan="2">Applicable maintenance data reference (at latest revision)</td></tr>
<tr><th colspan="5">For aircraft other than balloons</th></tr>
<tr><td>3a</td><td>Aircraft (other than balloons)</td><td></td><td colspan="2"></td></tr>
<tr><td>3b</td><td>Engine (if applicable)</td><td></td><td colspan="2"></td></tr>
<tr><td>3c</td><td>Propeller (if applicable)</td><td></td><td colspan="2"></td></tr>
<tr><th colspan="5">For balloons</th></tr>
<tr><td>3d</td><td>Envelope (only for balloons)</td><td></td><td colspan="2"></td></tr>
<tr><td>3e</td><td>Basket(s)</td><td></td><td colspan="2"></td></tr>
</table>

	(only for balloons)		
3f	Burner(s) **(only for balloons)**		
3g	Fuel cylinders **(only for balloons)**		

Additional maintenance requirements not covered above (applicable to all AMPs, regardless of whether they are based on design approval holder (DAH) data or minimum inspection programmes (MIPs))			
4	**Indicate if any of the following additional maintenance requirements are applicable (when replying 'YES', list the specific requirements in Appendix B to this AMP)**	Yes	No
	Maintenance due to specific equipment and modifications		
	Maintenance due to repairs		
	Maintenance due to life-limited components		
	Maintenance due to mandatory continuing-airworthiness information (airworthiness limitations (ALIs), certification maintenance requirements (CMRs), specific requirements in the TCDS, etc.)		
	Maintenance due to repetitive ADs		
	Maintenance due to specific operational/airspace directives/requirements (altimeter, compass, transponder, etc.)		
	Maintenance due to type of operation or operational approvals		
5	**Indicate if there is any maintenance due to specific recommendations in service bulletins, service letters, etc. (when replying 'YES', list the specific recommendations and any deviations in Appendix B to this AMP)**	Yes	No
Pilot-owner maintenance (only for aircraft operated under Part-NCO)			
6	**Does the pilot-owner perform Pilot-owner maintenance (ref. ML.A.803)?** If yes, enter the name of the pilot-owner(s) authorised to perform such maintenance: Pilot-owner name:_____Licence number:_____ Signature: _____Date: _____	Yes	No

Approval/declaration of the maintenance programme (select the appropriate option)		
7	Declaration by the owner: ☐	Approval by the contracted CAMO/CAO:☐
	'I hereby declare that this is the maintenance programme applicable to the aircraft referred to in Field 3, and I am fully responsible for its content and, in particular, for any deviations from the Design	Approval reference no of the CAMO/CAO: Signature/name/date:

	Approval Holder's recommendations.' Signature/name/date:	

Certification statement	
8	***'I will ensure that the aircraft is maintained in accordance with this maintenance programme and that the maintenance programme will be reviewed and updated as required.'*** Signed by the person/organisation responsible for the continuing airworthiness of the aircraft according to ML.A.201: Owner ☐ — Lessee ☐ — CAMO/CAO ☐ Name of owner/lessee or CAMO/CAO approval number: Address: Telephone/fax: Email: Signature/date:
9	Appendices attached: — Appendix A YES ☐ NO ☐ — Appendix B YES ☐ NO ☐

Appendix A — Minimum inspection programme (MIP)
(only applicable if a minimum inspection programme (MIP) different from the one described in AMC ML.A.302(d) is used — see Section 2 above)

Detail the tasks and inspections contained in the minimum inspection programme (MIP) being used.

Appendix B — Additional maintenance requirements
(include only if necessary — see Sections 4 and 5 above)

Task description	**References**	**Interval**
Maintenance due to specific equipment and modifications		
Maintenance due to repairs		

Maintenance due to life-limited components			
Maintenance due to mandatory continuing-airworthiness instructions (ALIs, CMRs, specific requirements in the TCDS, etc.)			
Maintenance due to repetitive ADs			
Maintenance due to specific operational/airspace directives/requirements (altimeter, compass, transponder, etc.)			
Maintenance due to type of operation or operational approvals			
Task description	**Recommended interval**	**Alternative inspection/task**	**Amended interval**
Maintenance due to specific recommendations in service bulletins, service letters, etc.			

EASA Form AMP, Issue 1

AMC ML.A.302(c) Aircraft maintenance programme

When evaluating possible deviations from the DAH's recommendations, such as the extension of time between overhaul (TBO) intervals, a risk-based approach should be taken, considering aspects such as the operation of aircraft, type of aircraft, hours/years in service, maintenance of the aircraft, compensating measures, redundancy of components, etc.

The following table provides more details of aspects which should be considered:

	Examples
OPS approval	HIGHER RISK: commercial air transport (CAT), commercial flight training MEDIUM RISK: flight training by an association, special operations (SPO) LOWER RISK: private
Flight rules	HIGHER RISK: instrument flight rules (IFR) MEDIUM RISK: visual flight rules (VFR) at night LOWER RISK: VFR by day
Aircraft weight	HIGHER RISK: ELA2 aircraft MEDIUM RISK: ELA1 aircraft LOWER RISK: light sport aeroplanes (LSA), very light aircraft (VLA), sailplanes and powered sailplanes
Who manages the airworthiness of the aircraft?	HIGHER RISK: owner LOWER RISK: CAMO/CAO
Who maintains the aircraft?	HIGHER RISK: pilot-owner MEDIUM RISK: independent certifying staff LOWER RISK: maintenance organisation
General physical aspect (aircraft, engine, etc.)	HIGHER RISK: negative impression MEDIUM RISK: neutral impression LOWER RISK: positive impression
Time in service (flight hours, years)	HIGHER RISK: very high number of hours/years MEDIUM RISK: medium number of hours/years LOWER RISK: low number of hours/years
Aircraft utilisation	HIGHER RISK: less than 50 h per year MEDIUM RISK: around 200 h per year LOWER RISK: more than 400 h per year
Reported occurrences	HIGHER RISK: frequent occurrences, numerous findings in aircraft continuing-airworthiness monitoring (ACAM) or ramp inspections. MEDIUM RISK: rare occurrences, few findings in ACAM inspections LOWER RISK: no occurrences, rare findings in ACAM inspections
System redundancy (for components such as	HIGHER RISK: single-engined aircraft LOWER RISK: multi-engined aircraft

engine/propeller)	
Compensating maintenance measures	HIGHER RISK: no supplementary measures LOWER RISK: supplementary measures (oil analysis, boroscope inspections, corrosion inspections, etc.)
Risk factor of the component failure	HIGHER RISK: engine failure on a helicopter MEDIUM RISK: engine failure on an aeroplane LOWER RISK: engine failure on an LSA, VLA, sailplane, or powered sailplane

The above information may be useful for CAMOs and CAOs when developing and approving maintenance programmes, and for the airworthiness review staff performing airworthiness reviews and reviewing the effectiveness of the declared maintenance programme. It may also be useful for the owner in order to take an informed decision before introducing deviations from the DAH's recommendations. Nevertheless, as allowed by ML.A.302(c)(7) and explained in GM ML.A.302, when the owner issues a declaration for the maintenance programme, they do not need to justify such deviations.

AMC ML.A.302(d) Aircraft maintenance programme

This AMC contains an acceptable minimum inspection programme (MIP) for aeroplanes of 2 730 kg maximum take-off mass (MTOM) and below, and for ELA2 aircraft other than airships, grouped in the following categories:

— aeroplanes of 2 730 kg MTOM and below;

— ELA2 sailplanes and ELA2 powered sailplanes; and

— ELA2 balloons.

These MIPs already comply with the requirements of ML.A.302(d) and may be used in order to define the basic information for the maintenance programme as required by ML.A.302(c)(2). However, the maintenance programme must be customised as required by ML.A.302(c)(5), which may be achieved by using the standard template contained in AMC ML.A.302.

It should be noted that using the 1-month tolerance permitted by ML.A.302(d)(1) for the annual inspection may result in an expired ARC.

MIP for aeroplanes of 2 730 kg MTOM and below

To be performed at every annual/100-h interval, whichever comes first.

A tolerance of 1 month or 10 h may be applied. The next interval shall be calculated from the time the inspection takes place.

Note 1: use the manufacturer's maintenance manual to accomplish each task/inspection.

Note 2: proper operation of backup or secondary systems and components should be performed wherever a check for improper installation/operation is carried out.

Aeroplanes of 2 730 kg MTOM and below	
System/component/area	**Task and inspection detail**
GENERAL	
General	Remove or open all necessary inspection plates, access doors, fairings, and cowlings. Clean the aircraft and aircraft engine as required.
Lubrication/servicing	Lubricate and replenish fluids in accordance with manufacturer's requirements.
Markings	Check that side and underwing registration markings are correct. If applicable, check that an exemption for alternate display is approved. Identification plate for national aviation authority (NAA)-registered aircraft is present, as well as other identification markings on fuselage in accordance with local (national) rules.
Weighing	Review weighing record to establish accuracy against installed equipment. Weigh the aircraft as required by Part-NCO.
AIRFRAME	
Fabric and skin	Inspect for deterioration, distortion, other evidence of failure, and defective or insecure attachment of fittings. NOTE: when checking composite structures, check for signs of impact or pressure damage that may indicate underlying damage.
Fuselage structure	Check frames, formers, tubular structure, braces, and attachments. Inspect for signs of corrosion and cracks.
Systems and components	Inspect for improper installation, apparent defects, and unsatisfactory operation.
Pitot-static system	Inspect for security, damage, cleanliness, and condition. Drain any water from condensation drains.
General	Inspect for lack of cleanliness and loose equipment that may foul the controls.
Tow hooks	Inspect for condition of moving parts and wear. Check service life. Carry out operational test.

CABIN AND COCKPIT	
Seats, safety belts and harnesses	Inspect for poor condition and apparent defects. Check for service life.
Windows, canopies and windshields	Inspect for deterioration and damage, and for function of emergency jettison.
Instrument panel assemblies	Inspect for poor condition, mounting, marking, and (where practicable) improper operation. Check markings of instruments in accordance with the flight manual.
Flight and engine controls	Inspect for improper installation and improper operation.
Speed/weight/manoeuvre placard	Check that the placard is correct and legible, and accurately reflects the status of the aircraft.
All systems	Inspect for improper installation, poor general condition, apparent and obvious defects, and insecurity of attachment.
LANDING GEAR	
Shock-absorbing devices	Inspect for improper oleofluid level. Inspect for wear and deformation of rubber pads, bungees, and springs.
All units	Inspect for poor condition and insecurity of attachment.
Retracting and locking mechanism	Inspect for improper operation.
Linkages, trusses and members	Inspect for undue or excessive wear fatigue and distortion.
Hydraulic lines	Inspect for leakage. Check service life.
Electrical system	Inspect for chafing and improper operation of switches.
Wheels	Inspect for cracks, defects, and condition of bearings.
Tires	Inspect for wear and cuts.
Brakes	Inspect for improper adjustment and wear. Carry out operational test.

Floats and skis	Inspect for insecure attachment and apparent defects.
WING AND CENTRE SECTION	
All components	Inspect all components of the wing and centre section assembly for poor general condition, fabric or skin deterioration, distortion, evidence of failure and insecurity of attachment.
Connections	Inspect main connections (e.g. between wings, fuselage, wing tips) for proper fit, play within tolerances, wear or corrosion on bolts and bushings.
FLIGHT CONTROLS	
Control circuit/stops	Inspect control rods and cables. Check that the control stops are secure and make contact.
Control surfaces	Inspect aileron, flap, elevator, air brake and rudder assemblies, hinges, control connections, springs/bungees, tapes and seals. Check full range of motion and free play.
Trim systems	Inspect trim surfaces, controls, and connections. Check full range of motion.
EMPENNAGE	
All components and systems	Inspect all components and systems that make up the complete empennage assembly for poor general condition, fabric or skin deterioration, distortion, evidence of failure, insecure attachment, improper component installation, and improper component operation.
AVIONICS AND ELECTRICS	
Batteries	Inspect for improper installation, improper charge, spillage and corrosion.
Radio and electronic equipment	Inspect for improper installation and insecure mounting. Carry out ground function test.
Wiring and conduits	Inspect for improper routing, insecure mounting, and obvious defects.
Bonding and shielding	Inspect for improper installation, poor condition, chafing and wear of insulation.
Antennas	Inspect for poor condition, insecure mounting, and improper operation.

POWER PLANT	
Engine section	Inspect for visual evidence of oil, fuel or hydraulic leaks and sources of such leaks.
Studs and nuts	Inspect for looseness, signs of rotation and obvious defects.
Internal engine	Inspect for cylinder compression (record measures for each cylinder) and for metal particles or foreign matter in oil filter, screens and sump drain plugs. If there is weak cylinder compression, inspect for improper internal condition and improper internal tolerances.
Engine mounts	Inspect for cracks, looseness of mounting, and looseness of the engine to the engine-mount attachment.
Flexible vibration dampeners	Inspect for poor condition and deterioration.
Engine controls	Inspect for defects, improper travel, and improper safe tying.
Lines, hoses and clamps	Inspect for leaks, improper condition, and looseness.
Exhaust stacks	Inspect for cracks, defects, and improper attachment.
Turbocharger and intercooler	Inspect for leaks, improper condition, and looseness of connections and fittings.
Liquid cooling systems	Inspect for leaks and proper fluid level.
Electronic engine control	Inspect for signs of chafing, and proper electronics and sensor installation.
Accessories	Inspect for apparent defects in security of mounting.
All systems	Inspect for improper installation, poor general condition, defects and insecure attachment.
Cowling	Inspect for cracks and defects. Check cowling flaps.
Cooling baffles and seals	Inspect for defects, improper attachment, and wear.
Fuel tanks	Inspect for leaks and improper installation and connection.

CLUTCHES AND GEARBOXES	
Filters, screens, and chip detectors	Inspect for metal particles and foreign matter.
Exterior	Inspect for oil leaks.
Output shaft	Inspect for excessive bearings' play and condition.
PROPELLER	
Propeller assembly	Inspect for cracks, nicks, binds, and oil leakage.
Propeller bolts	Inspect for proper installation, looseness, signs of rotation, and lack of safe tying.
Propeller control mechanism	Inspect for improper operation, insecure mounting, and restricted travel.
Anti-icing devices	Inspect for improper operation and obvious defects.
MISCELLANEOUS	
Ballistic rescue system	Inspect for proper installation, unbroken activation mechanism, proper securing while on ground, validity of inspection periods of pyrotechnic devices, and parachute-packing intervals.
Other miscellaneous items	Inspect installed miscellaneous items that are not otherwise covered by this listing for improper installation and improper operation.
OPERATIONAL CHECKS	
Power and revolutions per minute (rpm)	Check that power output, static and idle rpm are within published limits.
Magnetos	Check for normal function.
Fuel and oil pressure	Check that they are within normal values.
Engine temperatures	Check that they are within normal values.
Engine	For engines equipped with automated engine control (e.g. FADEC), perform the published run-up procedure and check for discrepancies.
Engine	For dry-sump engines, engines with turbochargers and liquid-cooled engines, check for signs of disturbed fluid circulation.
Pitot-static system	Perform operational check.
Transponder	Perform operational check.

MIP for ELA2 sailplanes and ELA2 powered sailplanes

To be performed:

— every 100-h/annual interval (for touring motor gliders (TMGs)), whichever comes first; or

— every annual interval (for the rest).

A tolerance of 1 month or 10 h, as applicable, may be applied. The next interval shall be calculated from the time the inspection takes place.

Note 1: use the manufacturer's maintenance manual to accomplish each task/inspection.

Note 2: in the case of TMGs, it is acceptable to control the hours of use of the aircraft, engine and propeller as separate entities. Any maintenance check to be carried out between two consecutive 100-h/annual inspections may be performed separately on the aircraft, engine and propeller, depending on when each element reaches the corresponding hours. However, at the time of the 100-h/annual, all the elements must be covered.

Note 3: proper operation of backup or secondary systems and components should be carried out wherever a check for improper installation/operation is performed.

ELA2 sailplanes and ELA2 powered sailplanes	
System/component/area	**Task and inspection detail**
GENERAL	
General — all tasks	The aircraft must be clean prior to inspection. Inspect for security, damage, wear, integrity, whether drain/vent holes are clear, for signs of overheating, leaks, chafing, cleanliness and condition, as appropriate to the particular task. Whilst checking composite structures, check for signs of impact or pressure damage that may indicate underlying damage.
Lubrication/servicing	Lubricate and replenish fluids in accordance with manufacturer's requirements.
Markings	Check that side and underwing registration markings are correct. If applicable, check that an exemption for alternate display is approved, if identification plate for NAA-registered aircraft is present., and if other identification markings on fuselage are in accordance with local (national) rules.
Weighing	Review weighing record to establish accuracy against installed equipment. Weigh the aircraft as required by Part-NCO.
AIRFRAME	
Fuselage paint/gel coat, including registration markings	Inspect external surface and fairings, gel coat, fabric covering or metal skin, and paintwork. Check that registration markings are correctly applied.
Fuselage structure	Check frames, formers, tubular structure, skin, and attachments. Inspect for signs of corrosion on tubular framework.
Nose fairing	Inspect for evidence of impact with ground or objects.
Release hook(s)	Inspect nose and centre of gravity, release hooks and controls. Check operational life. Carry out operational test. If more than one release hook or control is fitted, check operation of all release hooks from all positions.
Pot pitot/ventilator	Check alignment of probe, check operation of ventilator.
Pitot-static system	Inspect pitot probes, static ports, and all tubing (as accessible) for security, damage, cleanliness, and condition. Drain any water from condensate drains.

Bonding/vents drains	Check all bonding leads and straps. Check that all vents and drains are clear from debris.
CABIN AND COCKPIT	
Cleanliness/loose articles	Check under cockpit floor/seat pan and in rear fuselage for debris and foreign items.
Canopy, locks and jettison	Inspect canopy, canopy frame and transparencies for cracks, unacceptable distortion, and discolouration. Check operation of all locks and catches. Carry out an operational test of the canopy jettison system from all positions.
Seat/cockpit floor	Inspect seat(s). Check that all loose cushions are correctly installed and, as appropriate, that energy-absorbing foam cushions are fitted correctly. Ensure that all seat adjusters fit and lock correctly.
Harness(es)	Inspect all harnesses for condition, and wear of all fastenings, webbing, and fittings. Check operation of release and adjustments.
Rudder pedal assemblies	Inspect rudder pedal assemblies and adjusters.
Instrument panel assemblies	Inspect instrument panel and all instruments/equipment. Check if instrument readings are consistent with ambient conditions. Check marking of all switches, circuit breakers, and fuses. Check operation of all installed equipment, as possible in accordance with the manufacturer's instructions. Check markings of instruments in accordance with the aircraft flight manual.
Oxygen system	Inspect oxygen system. Check bottle hydrostatic-test date expiry in accordance with the manufacturer's recommendations. Ensure that bottle is not completely empty (13,8 bars/200 psi minimum) and refill with aviator's oxygen only. Clean masks and regulators with approved cleaning wipes. Ensure that oxygen installation is recorded on weight and centre-of-gravity schedule. CAUTION: OBSERVE ALL SAFETY PRECAUTIONS.
Colour-coding of controls	Ensure that controls are colour-coded and in good condition, as follows: — tow release: yellow; — air brakes: blue; — trimmer: green; — canopy's normal operation: white; — canopy jettison: red; and — other controls: clearly marked but not using any of the above colours.

Equipment stowed in centre section	Check for security and condition. Check validity of any safety equipment. Check manufacturer's and NAAs' (if required) data plates.
Speed/weight/manoeuvre placards	Check that the placard is correct and legible, and accurately reflects the status of the aircraft.
LANDING GEAR	
Front skid/nose wheel and mounts	Inspect for evidence of hard/heavy landings. Check skid wear. Inspect wheel, tyre, and wheel box. Check tyre pressure.
Main wheel and brake assembly	Check for integrity of hydraulic seals and leaks in pipework. Check life of hydraulic hoses and components, if specified by the manufacturer. Remove brake drums, check brake lining wear. Check disk/drum wear. Refit drum. Check brake adjustment. CAUTION: BRAKE DUST MAY CONTAIN ASBESTOS. Check operation of brake. Check level of brake fluid and replenish, if necessary. Check tyre pressure. CAUTION: CHECK TYPE OF BRAKE FLUID USED AND OBSERVE SAFETY PRECAUTIONS.
Undercarriage suspension	Check springs, bungees, shock absorbers, and attachments. Check for signs of damage. Service strut, if applicable.
Undercarriage retract system and doors	Check retraction mechanism and controls, warning system if fitted, gas struts, doors and linkages/springs, over-centre/locking device. Perform retraction test.
Tail skid/wheel	Inspect for evidence of hard/heavy landings. Check skid wear. Inspect wheel, tyre, and wheel box. Check bond of bonded skids. Check tyre pressure.
Wheel brake control circuit	Inspect wheel brake control rods/cables. If combined with air brake, ensure correct rigging relationship. Check parking-brake operation, if fitted.
WING AND CENTRE SECTION	
Centre section fairing	Inspect for security, damage, and condition.
Wing attachments	Inspect the structural attachments of the wing. Check for damage, wear, and security. Check for rigging damage. Check condition of wing attachment pins.
Aileron control circuit/stops	Inspect aileron control rods/cables. Check that control stops are secure and make contact. Inspect self-connecting control devices.

Air brake control circuit	Inspect air brake control rods/cables. Check friction/locking device (if fitted). Inspect self-connecting control devices.
Wing struts/wires	Inspect struts for damage and internal corrosion. Re-inhibit struts internally every 3 years or in accordance with the manufacturer's instructions.
Wings including underside registration markings	Check mainplane structure externally and internally, as far as possible. Check gel coat, fabric covering, or metal skin. Check that registration marks are correctly applied.
Ailerons and controls	Inspect aileron and flaperon assemblies, hinges, control connections, springs/bungees, tapes, and seals. Ensure that seals do not impair the full range of movement.
Air brakes/spoilers	Inspect air brake/spoiler panel(s) operating rods, closure springs, and friction devices, as fitted.
Flaps	Check flap system and control. Inspect self-connecting control devices.
Control deflections and free play, and record them on worksheets	Check and record range of movements and cable tensions, if specified, and check free play.
EMPENNAGE	
Tailplane and elevator	With tailplane de-rigged, check tailplane and attachments, self-connecting and manual control connections. Check gel coat, fabric covering, or metal skin.
Rudder	Check rudder assembly, hinges, attachments, balance weights.
Rudder control circuit/stops	Inspect rudder control rods/cables. Check that control stops are secure and make contact. Pay particular attention to wear and security of liners and cables in 'S' tubes.
Elevator control circuit/stops	Inspect elevator control rods/cables. Check that control stops are secure and make contact. Inspect self-connecting control devices.
Trimmer control circuit	Inspect trimmer control rods/cables. Check friction/locking device.
Control deflections and free play, and record them on worksheets	Check and record range of movements and cable tensions, if specified, and check free play.

AVIONICS AND ELECTRICS	
Electrical installation/fuses	Check all electrical wiring for condition. Check for signs of overheating and poor connections. Check fuses/trips for condition and correct rating.
Battery security and corrosion	Check battery mounting for security and operation of clamp. Check for evidence of electrolyte spillage and corrosion. Check that battery has correct main fuse fitted. It is recommended to carry out battery capacity test on gliders equipped with radio, used for cross-country, controlled airspace, or competition flying.
Radio installations and placards	Check radio installation, microphones, speakers and intercom, if fitted. Check that call sign placard is installed. Carry out ground function test. Record radio type fitted.
Air speed indicator calibration	Carry out calibration of the airspeed indicator (in situ permissible) in accordance with the manufacturer's instructions — use manufacturer's limits. If not available, a maximum error of 2 kt (or 3.5 km/h) is allowed.
Altimeter datum	Check barometric subscale. Maximum error allowed: 2 Mb.
Pitot-static system	Perform operational check.
Transponder	Perform operational check.
MISCELLANEOUS	
Removable ballast	Check removable ballast mountings and securing devices (including fin ballast, if applicable) for condition. Check that ballast weights are painted with conspicuous colour. Check that provision for the ballast is made on the loading placard.
Drag chute and controls	Inspect chute, packing and release mechanism. Check packing intervals.
Water ballast system	Check water ballast system, wing and tail tanks, as fitted. Check filling points, level indicators, vents, dump and frost drains for operation and leakage. If loose bladders are used, check for leakage and expiry date, as applicable.
POWER PLANT (when applicable) **NOTE: In the case of sailplanes with electrical or jet engines, follow the maintenance instructions and recommendations of the design approval holder.**	
Engine pylons and mountings	Inspect engine and pylon installation. Check engine compartment and fire sealing.
Gas strut	Check gas strut.

Pylon/engine stops	Check limit stops on retractable pylons. Check restraint cables.
Electric actuator	Inspect electric actuator, motor, spindle drive, and mountings.
Electrical wiring	Inspect all electrical wiring. Pay special attention to wiring that is subject to bending during extension and retraction of engine/pylon.
Limit switches	Check operation of all limit switches and strike plates. Make sure that they are not damaged by impact.
Fuel tank(s)	Check fuel tank mountings and tank integrity. Check fuel quantity indication system, if fitted.
Fuel pipes and vents	Check all fuel pipes, especially those subject to bending during extension and retraction of engine/pylon. Check that vents are clear. Make sure that overboard drains do not drain into engine compartment. Check self-sealing.
Fuel cock or shut-off valve	Check operation of fuel cock or shut-off valve and indications.
Fuel pumps and filters	Clean or replace filters, as recommended by manufacturer. Check operation of fuel pumps for engine supply or tank replenishment. Check fuel pump controls and indications.
Decompression valve	Inspect decompression valve and operating control.
Spark plugs	Carry out spark plug service. It is recommended to replace spark plugs at annual intervals.
Harnesses and magnetos	Inspect low-tension and high-tension wiring, connectors, spark plug caps. Check magneto-to-engine timing. Check impulse coupling operation.
Propeller bolts, assembly, mounting, torquing, and drive belt	Inspect propeller, hub, folding mechanism, brake, pitch change mechanism, stow sensors.
Doors	Check engine compartment doors, operating cables, rods, and cams.
Safety springs	Check all safety and counterbalance springs.
Extension and retraction	Check that extension and retraction operation times are within limits specified by the manufacturer. Check light indications and interlocks for correct operation.
Exhaust	Inspect exhaust system, silencer, shock mounts, and links.

Engine installation	Inspect engine and all accessories. Carry out compression test and record results (for piston engines). Compression test results: — No 1 (left/front); and — No 2 (right/rear).
Lubrication	Change engine oil and filter. Replenish oil and additive tanks.
Engine instruments	Inspect all engine instruments and controls. Check control unit, mounts, bonding and connections. Carry out internal self-test, if fitted.
Engine battery	If separate from airframe battery, inspect battery and mountings. If main fuse is fitted, check rating and condition.
Engine battery capacity test	Carry out capacity test. Refer to appropriate manual or guidance.
Placards	Check that all placards are in accordance with the aircraft flight manual and legible.
Oil and fuel leaks	With the engine fully serviced, check the fuel and oil system for leaks.

MIP for ELA2 balloons

To be performed at every 100-h/annual interval, whichever comes first.

A tolerance of 1 month or 10 h may be applied. The next interval shall be calculated from the time the inspection takes place.

Note 1: use the manufacturer's maintenance manual to accomplish each task/inspection.

Note 2: proper operation of backup or secondary systems and components should be carried out wherever a check for improper installation/operation is performed.

(a) Envelope

System/component/area	Task and inspection detail
Identification (type/serial number/registration plate)	Check for presence.
Crown ring and line	Check if it is in place and not corroded, and that the crown line is undamaged and has appropriate length.
Vertical/horizontal-load tapes	Check joints with the crown ring, top of the envelope and wires. Check that all load tapes are undamaged along their entire length. Inspect base horizontal tape and edge of the envelope top. Inspect joint

	between base horizontal-load tape and vertical-load tapes.
Envelope fabric	Inspect the envelope fabric panels (including parachute and rotation vents, if fitted) for damage, porosity overheating or weakness. Unrepaired damage is within tolerance provided for by the manufacturer. If substantial fabric porosity is suspected, then a flight test should be performed, but only after a grab test has demonstrated that the balloon is safe to fly. Perform grab test in accordance with the manufacturer's instructions.
Flying cables	Inspect for damage (particularly heat damage). Check that yellow core of the Kevlar cable is not visible.
Karabiners	Inspect for damage. Check if karabiner lock works properly.
Melting link and 'Tempilabel'	Check maximum temperature indication (flag/telltales).
Control system lines	Inspect for damage wear, security of knots. Check proper length. Check lines attachments for damage, wear, security.
Control lines and their attachments	Inspect for damage, wear, security of knots. Check proper length of the lines.
Envelope pulleys	Inspect for damage, wear, free running, contamination, security of attachment.

(b) Burner

System/component/area	Task and inspection detail
Identification (type/serial number)	Check for presence and verify type/serial number installed.
Burner frame	Inspect welds for cracking.
	Inspect tubes for distortion/deformation/cuts/gouges.
	Inspect frame for security of fasteners (heat shields, flexi-corners).
	Inspect frame lugs for wear and cracking.

	Inspect general condition (corrosion, heat shields).
Gimballing	Check stiffness and security of fitting manifolds.
Leak check	Perform leak check of the burner.
Hoses	Inspect all hoses for wear, damage, leak and life time limitation.
Pressure gauges	Check that the pressure Gauge reads zero when no pressure applied, and that lens are present.
Pilot valves/flame	Check shut-off, free movement, correct function, and lubricate if necessary.
Whisper valves/flame	Check shut-off, free movement, correct function, and lubricate if necessary.
Main valves/flame	Check shut-off, free movement, correct function, and lubricate if necessary.
Coils	Check for damage, distortion, security of fasteners. Inspect welds for cracking. Check security of jets. Tighten or replace, as necessary.
Fuel	Check correct type, check dates (if applicable).

(c) Basket

System/component/area	Task and inspection detail
Identification (type/serial number)	Check for presence.
Basket body	Check the general condition of the basket body. Inspect weave for damage, cracks/holes. Check for no sharp objects inside the basket.
Basket wires	Inspect for damage, check eye rings.
Karabiners	Inspect for damage.Check if karabiner lock works properly.
Basket floor	Inspect for damage and cracks.
Runners	Inspect for damage.
Rawhide	Inspect for damage, wear and attachments to the floor.
Rope handles	Inspect for damage, security of attachment.

Cylinder straps	Inspect for damage, deterioration.
Padded basket edge trim	Inspect for damage and wear.
Burner rods	Inspect for damage, wear and cracking.
Padded burner rod covers	Inspect for damage and wear.
Basket equipment	Check presence and functionality.
Pilot restraint	Inspect for security and condition.
Fire extinguisher	Check expiration date and protection cover.
First-aid kit	Check for completeness and expiration date.

(d) Fuel tanks

System/component/area	Task and inspection detail
Identification (type/serial number)	Check for presence.
Cylinder	Check if periodic inspections for each cylinder are valid (date) (e.g. 10 years' inspection).
Cylinder body	Inspect for damage, corrosion.
Liquid valve	Inspect for damage, corrosion, correct operation.
	Inspect O-ring seals, lubricate/replace as required.
Fixed liquid Level gauge	Inspect for damage, corrosion, correct operation.
Contents Gauge	Inspect for damage, corrosion, freedom of movement.
Vapour valve	Inspect for damage, corrosion, correct operation (including regulator).
	Inspect quick-release coupling for correct operation, sealing.
Padded cover	Inspect for damage.
Pressure relief valve	Check that it does not indicate overpressure
Assembly	Inspect, and test for leaks all pressure-holding joints using leak

	detector.
	Perform functional test

(e) Additional equipment

System/component/area	Task and inspection detail
Instruments	Perform functional check.
Quick release	Perform functional check and inspect the condition of the latch, bridle and ropes for wear and deterioration. Check that the karabiners are undamaged and operate correctly.
Communication/navigation equipment (radio)	Perform operational check.
Transponder	Perform operational check.

GM ML.A.302 Aircraft maintenance programme

The responsibilities associated with maintenance programmes developed in accordance with ML.A.302 are the following:

— If the owner has contracted a CAMO or CAO in order to manage the continuing airworthiness of the aircraft, this organisation is responsible for developing and approving a maintenance programme which:

- indicates whether this programme is based on data from the design approval holder (DAH) or on the minimum inspection programme (MIP) described in ML.A.302(d);
- identifies the owner and the specific aircraft, engine, and propeller (as applicable);
- includes all mandatory maintenance information and any additional tasks derived from the assessment of the DAH's recommendations;
- justifies any deviations from the DAH's recommendations;
- does not fall below the requirements of the MIP; and
- is customised to the particular aircraft type, configuration and operation, in accordance with ML.A.302(c)(5).

— If the owner has not contracted a CAMO or CAO in order to manage the continuing airworthiness of the aircraft, then the owner is responsible for developing and declaring the maintenance programme, assuming full responsibility for its content and for any deviations from the DAH's recommendations. In this case, these deviations do not need to be justified. However, the maintenance programme still needs to comply with the requirements contained in

ML.A.302(c), in particular with the obligation to not fall below the requirements of the MIP and to comply with the mandatory continuing-airworthiness information.

— The content of the owner-declared maintenance programme cannot be challenged up-front either by the competent authority, the contracted CAMO/CAO, or the contracted maintenance organisation. This declared maintenance programme is the basis for adequate planning of maintenance, as well as for the airworthiness reviews and the content of the aircraft continuing-airworthiness monitoring (ACAM) inspections in accordance with ML.B.303. Nevertheless, the maintenance programme will be subject to periodic reviews at the occasion of the airworthiness review and, in case of discrepancies, linked with deficiencies in the content of the maintenance programme, the owner shall amend the maintenance programme accordingly, as required by ML.A.302(c)(9).

— When the competent authority is notified of deficiencies linked with the content of the declared maintenance programme for a particular aircraft (in case no agreement is reached between the owner and the airworthiness review staff about the changes required in the maintenance programme), the competent authority should contact the owner, request a copy of the maintenance programme and use the information received for the adequate planning of the ACAM programme. Based on the reported deficiencies and the identified risks, the competent authority will adapt the ACAM programme accordingly. This notification will also allow that the competent authority agrees on the changes to the maintenance programme, as required by ML.A.302(c)(9).

— Although there is no requirement for the owner to send a copy of the declared maintenance programme to the competent authority, this does not prevent the competent authority from requesting at any time the owner to send a copy, even if deficiencies have not been reported.

— Since the maintenance programme has to identify the deviations from the DAH's recommendations, the airworthiness reviews and ACAM inspections should place emphasis on the inspection of the areas affected by those deviations in order to make sure that the maintenance programme is effective.

— Since the competent authority is not responsible for the content of a declared maintenance programme, the competent authority does not authorise deviations from its content. In such cases, the owner may always declare an amended AMP.

AMC ML.A.402 Performance of maintenance

Examples of acceptable methods to record and document the maintenance performed are the following:

— a copy of the 100-h/annual inspection checklist with ticks and signature; and

— a copy of the release to service indicating the tasks performed.

AMC ML.A.403 Aircraft defects

Aircraft equipment should be declared as defective if there is a significant risk that it will fail to perform the functions required at a level of performance consistent with the acceptable level of safety of the

operation. This does not prevent the pilot from recording observations and comments on the performance of the aircraft equipment where this is not considered to constitute a defect.

GM ML.A.403 Aircraft defects

Where appropriate certifying staff are readily available for consultation, the pilot should consider consultation with them before deferring any defect.

AMC ML.A.801(e) Aircraft certificate of release to service

(a) The aircraft certificate of release to service (CRS) should contain one of the following statements:

(1) 'Certifies that the work specified, except as otherwise specified, was carried out in accordance with Part-ML, and in respect of that work, the aircraft is considered ready for release to service.'; or

(2) for a pilot-owner:

'Certifies that the limited pilot-owner maintenance specified, except as otherwise specified, was carried out in accordance with Part M, and in respect of that work, the aircraft is considered ready for release to service.'.

(b) The CRS should relate to the task specified in the manufacturer's or operator's instruction or the aircraft maintenance programme which itself may cross-refer to a manufacturer's/operator's instruction in a maintenance manual, service bulletin etc.

(c) The CRS should include the date when the maintenance took place relative to any life or overhaul limitation in terms of date/flying hours/cycles/ landings etc., as appropriate.

(d) When extensive maintenance has been carried out, it is acceptable for the CRS to summarise the maintenance as long as there is a unique cross reference to the work pack containing full details of the maintenance carried out. Dimensional information should be retained in the work pack record.

(e) The person issuing the CRS should use his normal signature except in the case where a computer release-to-service system is used. In this latter case, the competent authority need to be satisfied that only this particular person may electronically issue the CRS. One such method of compliance is the use of a magnetic or optical personal card in conjunction with a personal identity number (PIN) known only to the individual, which is keyed into the computer. A certification stamp is optional.

(f) At the completion of all maintenance, owners, certifying staff, operators and maintenance organisations should ensure they have a clear, concise and legible record of the work performed.

(g) In the case of an M.A.801(b)(2) CRS, certifying staff should retain all records necessary to prove that all requirements have been met for the issuance of a CRS.

AMC ML.A.803 Pilot-owner authorisation

(a) A pilot-owner may only issue a certificate of release to service (CRS) for maintenance they have performed.

(b) In the case of jointly-owned aircraft, the aircraft maintenance programme (AMP) should list the names of all pilot-owners that are competent and designated to perform Pilot-owner maintenance. An alternative may be that the AMP contains a procedure to ensure how such a list should be managed and kept current.

(c) An equivalent valid pilot-owner licence may be any document attesting a pilot qualification recognised by the Member State.

(d) Not holding a valid medical examination does not invalidate the pilot licence (or equivalent) required under ML.A.803(a)(1) for the purpose of the pilot-owner authorisation.

AMC to Appendix II — Limited Pilot-owner maintenance

(a) The lists below specify items that may be expected to be completed by an owner who holds a current and valid pilot licence for the aircraft type involved and who meets the competence and responsibility requirements of Appendix II to Part-ML.

(b) The list of tasks may not address in a detailed manner the specific needs of the various aircraft categories. In addition, the development of technology and the nature of the operations undertaken by these categories of aircraft may not always be adequately considered.

(c) Therefore, the following lists are considered to meet the representative scope of limited Pilot-owner maintenance referred to in ML.A.803 and Appendix II to Part-ML:

(1) Part A applies to aeroplanes;

(2) Part B applies to rotorcraft;

(3) Part C applies to sailplanes and powered sailplanes; and

(4) Part D applies to balloons and airships.

(d) Inspection tasks/checks of any periodicity included in an approved maintenance programme can be carried out provided that the specified tasks are included in the generic lists of Parts A to D of this AMC and remain compliant with the basic principles of Appendix II to Part-ML.

The content of periodic inspections/checks as well as their periodicity is not regulated or standardised in an aviation specification. It is the decision of the manufacturer/type certificate holder (TCH) to recommend a schedule for each specific type of inspection/check.

For an inspection/check with the same periodicity for different TCHs, the content may differ and in some cases, may be critically safety-related and need the use of special tools or knowledge and thus, not qualify for Pilot-owner maintenance. Therefore, the maintenance carried out by the pilot-owner should not be generalised to specific inspections such as of a 50-h, 100-h or 6-month periodicity.

The inspections to be carried out are limited to those areas and tasks listed in this AMC to Appendix II; this allows flexibility in the development of the maintenance programme and does not limit the inspection to certain specific periodic inspections. A 50-h/6-month periodic inspection for a fixed-wing aeroplane as well as the 1-year inspection for a glider may normally be eligible for Pilot-owner maintenance.

NOTE: Any other task meeting the requirements of Appendix II to Part-ML may also be performed by the pilot-owner.

TABLES

Note: Tasks in Part A or Part B marked with '**' exclude instrument flight rules (IFR) operations following Pilot-owner maintenance. For these aircraft to operate under IFR, these tasks should be released by an appropriate certifying staff.

Part A — PILOT-OWNER MAINTENANCE TASKS for POWERED AIRCRAFT (AEROPLANES)

ATA	Area	Task	Aeroplanes
09	Towing	Tow release unit and tow cable retraction mechanism — cleaning, lubrication and tow cable replacement (including weak links)	Yes
		Mirror — installation and replacement of mirrors	Yes
11	Placards	Placards, markings — installation and renewal of placards and markings required by the aircraft flight manual (AFM) and aircraft maintenance manual (AMM)	Yes
12	Servicing	Those items not requiring a disassembly of other than non-structural items, such as cover plates, cowlings and fairings — lubrication	Yes
20	Standard practices	Safety wiring — replacement of defective safety wiring or cotter keys, excluding those in engine controls, transmission controls and flight control systems	Yes
		Simple non-structural standard fasteners — replacement and adjustment, excluding the replacement of receptacles and anchor nuts requiring riveting	Yes
21	Air conditioning	Replacement of flexible hoses and ducts	Yes
23	Communication	Communication devices — remove and replace self-contained, instrument-panel-mounted communication devices with quick-disconnect connectors, excluding IFR operations	Yes**
24	Electrical power	Batteries — replacement and servicing, excluding servicing of nickel-cadmium (Ni-Cd) batteries and IFR operations	Yes**

		Wiring — repairing broken circuits in non-critical equipment, excluding ignition system, primary generating system and required communication, as well as navigation system and primary flight instruments	Yes
		Bonding — replacement of broken bonding cable	Yes
		Fuses — replacement using the correct rating	Yes
25	Equipment	Safety belts — replacement of safety belts and harnesses excluding belts fitted with airbag systems	Yes
		Seats — replacement of seats or seat parts not involving disassembly of any primary structure or control system	Yes
		Non-essential instruments and/or equipment — replacement of self-contained, instrument-panel-mounted equipment with quick-disconnect connectors	Yes
		Oxygen system — replacement of portable oxygen bottles and systems in approved mountings, excluding permanently installed bottles and systems	Yes
		Emergency locator transmitter (ELT) — removal/reinstallation	Yes
27	Flight controls	Removal or reinstallation of co-pilot control column and rudder pedals where design provides for quick disconnect	Yes
28	Fuel system	Fuel filter elements — cleaning and/or replacement	Yes
30	Ice and rain protection	Windscreen wiper – replacement of wiper blade	Yes
31	Instruments	Instrument panel — removal and reinstallation provided that this is a design feature with quick -disconnect connectors, excluding IFR operations	Yes**
		Pitot-static system — simple sense and leak check, excluding IFR operations	Yes**

		Drainage — drainage of water drainage traps or filters within the pitot-static system, excluding IFR operations	Yes**
		Instruments — checking of markings for legibility and that those readings are consistent with ambient conditions	Yes
32	Landing gear	Wheels — removal, replacement and servicing, including replacement of wheel bearings and lubrication	Yes
		Servicing — replenishment of hydraulic fluid	Yes
		Shock absorber — replacement of elastic cords or rubber dampers	Yes
		Shock struts — replenishment of oil or air	Yes
		Skis — changing between wheel and ski landing gear	Yes
		Landing skids — replacement of landing skids and skid shoes	Yes
		Wheel fairings (spats) — removal and reinstallation	Yes
		Mechanical brakes — adjustment of simple cable-operated systems	Yes
		Brake — replacement of worn brake pads	Yes
33	Lights	Lights — replacement of internal and external bulbs, filaments, reflectors and lenses	Yes
34	Navigation	Software — updating self-contained, instrument-panel-mounted navigational-software databases, excluding automated flight control systems and transponders	Yes
		Navigation devices — removal and replacement of self-contained, instrument-panel-mounted navigation devices with quick-disconnect connectors, excluding automated flight control systems, transponders, primary flight control system and IFR operations	Yes**

		Self-contained data logger — installation, data restoration	Yes
51	Structure	Fabric patches — simple patches extending over no more than one rib, and not requiring rib stitching or removal of structural parts or control surfaces	Yes
		Protective coating — application of preservative material or coatings where no disassembly of any primary structure or operating system is involved	Yes
		Surface finish — minor restoration (where no disassembly of any primary structure or operating system is involved), including application of signal coatings or thin foils as well as registration markings	Yes
		Fairings — simple repairs to non-structural fairings and cover plates that do not change the contour	Yes
52	Doors and hatches	Doors — removal and reinstallation	Yes
53	Fuselage	Upholstery, furnishing — minor repairs that do not require disassembly of primary structure or operating systems, or interfere with control systems	Yes
56	Windows	Side windows — replacement if no riveting, bonding or any special process is required	Yes
61	Propeller	Spinner — removal and reinstallation	Yes
71	Power plant installation	Cowling — removal and reinstallation not requiring removal of propeller or disconnection of flight controls	Yes
		Induction system — inspection and replacement of induction air filter	Yes
72	Engine	Chip detectors — removal, checking and reinstallation provided that the chip detector is of a non-electrically-indicated self-sealing type	Yes
73	Engine fuel	Strainer or filter elements — cleaning and/or replacement	Yes

		Fuel — mixing of required oil into fuel	Yes
74	Ignition	Spark plugs — removal, cleaning, adjustment and reinstallation	Yes
75	Cooling	Coolant — replenishment of coolant fluid	Yes
77	Engine-indicating system	Engine-indicating system — removal and replacement of self-contained, instrument-panel-mounted indicators that have quick-release connectors and do not employ direct reading connections	Yes
79	Oil system	Strainer or filter elements — cleaning and/or replacement	Yes
		Oil — changing or replenishment of engine oil and gearbox fluid	Yes

Part B — PILOT-OWNER MAINTENANCE TASKS for ROTORCRAFT

ATA	Area	Task	Rotorcraft
11	Placards	Placards, markings — installation and renewal of placards and markings required by the AFM and AMM	Yes
12	Servicing	Fuel, oil, hydraulic, de-iced and windshield liquid replenishment	Yes
		Those items not requiring a disassembly of other than non-structural items, such as cover plates, cowlings and fairings — lubrication	Yes
20	Standard practices	Safety wiring — replacement of defective safety wiring or cotter keys, excluding those in engine controls, transmission controls and flight control systems	Yes
		Simple non-structural standard fasteners — replacement and adjustment, excluding latches as well as the replacement of receptacles and anchor nuts requiring riveting	Yes
21	Air conditioning	Replacement of flexible hoses and ducts	Yes
23	Communication	Communication devices — removal and replacement of self-contained, instrument-panel-mounted communication devices with quick-disconnect connectors, excluding IFR operations	Yes**
24	Electrical power	Batteries — replacement and servicing, excluding servicing of Ni-Cd batteries and IFR operations	Yes**
		Wiring — repairing broken circuits in non-critical equipment, excluding ignition system, primary generating system and required communication, navigation system and primary flight instruments	Yes
		Bonding — replacement of broken bonding cable, excluding bonding of rotating parts and flying controls	Yes
		Fuses — replacement using the correct rating	Yes

25	Equipment	Safety belts — replacement of safety belts and harnesses, excluding belts fitted with airbag systems	Yes
		Seats — replacement of seats or seat parts not involving disassembly of any primary structure or control system, excluding flight crew seats	Yes
		Removal/installation of emergency flotation gears with quick-disconnect connectors	Yes
		Non-essential instruments and/or equipment — replacement of self-contained, instrument-panel-mounted equipment with quick-disconnect connectors	Yes
		ELT — removal/reinstallation	Yes
30	Protection from ice and rain	Windshield wiper replacement	Yes
31	Instruments	Instrument panel — removal and reinstallation provided that this it is a design feature with quick-disconnect connectors, excluding IFR operations	Yes**
		Pitot-static system — simple sense and leak check, excluding IFR operations	Yes**
		Drainage — drainage of water drainage traps or filters within the pitot-static system, excluding IFR operations	Yes**
		Instruments — checking of markings for legibility and that those readings are consistent with ambient conditions	Yes
32	Landing gear	Wheels — removal, replacement and servicing, including replacement of wheel bearings and lubrication	Yes
		Replacement of skid wear shoes	Yes
		Fitting and removal of snow landing pads	Yes
		Servicing — replenishment of hydraulic fluid	Yes
		Brake — replacement of worn brake pads	Yes
33	Lights	Lights — replacement of internal and external	Yes

		bulbs, filaments, reflectors and lenses	
34	Navigation	Software — updating of self-contained, instrument-panel-mounted navigational-software databases, excluding automated flight control systems and transponders	Yes
		Navigation devices — removal and replacement of self-contained, instrument-panel-mounted navigation devices with quick-disconnect connectors, excluding automated flight control systems, transponders, primary flight control system and IFR operations	Yes**
		Self-contained data logger — installation, data restoration	Yes
51	Structure	Protective coating — application of preservative material or coatings where no disassembly of any primary structure or operating system is involved	Yes
		Surface finish — minor restoration (where no disassembly of any primary structure or operating system is involved, excluding intervention on main and tail rotors), including application of signal coatings or thin foils as well as registration markings	Yes
		Fairings — simple repairs to non-structural fairings and cover plates that do not change the contour	Yes
52	Doors	Doors — removal and reinstallation	Yes
53	Fuselage	Upholstery, furnishing — minor repairs that do not require disassembly of primary structure or operating systems, or interfere with control systems	Yes
56	Windows	Side windows — replacement if no riveting, bonding or any special process is required	Yes
62	Main rotor	Removal/installation of main-rotor blades (designed for removal where special tools are not required, excluding tail-rotor blades), limited to reinstallation of the same blades previously removed in the original position	Yes
63	Transmission	Chip detectors — removal, checking and	Yes

65		replacement provided that the chip detector is of a non-electrically-indicated self-sealing type	
67	Flight control	Removal or reinstallation of co-pilot cyclic and collective controls and yaw pedals where design provides for quick disconnect	Yes
71	Power plant installation	Cowlings — removal and refitment	Yes
72	Engine	Chip detectors — removal, checking and reinstallation provided that the chip detector is of a non-electrically-indicated self-sealing type	Yes
79	Oil system	Filter elements — replacement, provided that the element is of the 'spin on/off' type	Yes
		Oil — changing or replenishment of engine oil	Yes

Part C — PILOT-OWNER MAINTENANCE TASKS for SAILPLANES AND POWERED SAILPLANES

Abbreviations/acronyms applicable to this Part:

— N/a not applicable for this category;

— SP sailplane;

— SSPS self-sustained powered sailplane; and

— SLPS/TM self-launching powered sailplane/touring motorglider.

ATA	Area	Task	SP	SSPS	SLPS/TM
08	Weighing	Recalculation, small changes of the trim plan without needing a reweighing	Yes	Yes	Yes
09	Towing	Tow release unit and tow cable retraction mechanism — cleaning, lubrication and tow cable replacement (including weak links)	Yes	Yes	Yes
		Mirror — installation and replacement of mirrors	Yes	Yes	Yes
11	Placards	Placards, markings — installation and renewal of placards and markings required by the AFM and AMM	Yes	Yes	Yes
12	Servicing	Those items not requiring a disassembly of other than non-structural items, such as cover plates, cowlings and fairings — lubrication	Yes	Yes	Yes
20	Standard practices	Safety wiring — replacement of defective safety wiring or cotter keys, excluding those in engine controls, transmission controls and flight control systems	Yes	Yes	Yes
		Simple non-structural standard fasteners — replacement and adjustment, excluding the replacement of receptacles and anchor nuts requiring riveting	Yes	Yes	Yes
		Free play — measurement of the free play in the control system and the wing-to-fuselage attachment, including minor adjustments by simple means provided by the manufacturer	Yes	Yes	Yes
21	Air conditioning	Replacement of flexible hoses and ducts	Yes	Yes	Yes

23	Communication	Communication devices — removal and replacement of self-contained, instrument-panel-mounted communication devices with quick-disconnect connectors	Yes	Yes	Yes
24	Electrical power	Batteries and solar panels — replacement and servicing	Yes	Yes	Yes
		Wiring — installation of simple wiring connections to the existing wiring for additional non-required equipment, such as electric variometers, flight computers, but excluding required communication, navigation systems and engine wiring	Yes	Yes	Yes
		Wiring — repairing of broken circuits in landing light and any other wiring for non-required equipment, such as electrical variometers or flight computers, excluding ignition system, primary generating system, required communication and navigation system, as well as primary flight instruments	Yes	Yes	Yes
		Bonding — replacement of broken bonding cable	Yes	Yes	Yes
		Switches — this includes soldering and crimping of non- required equipment, such as electrical variometers or flight computers, but excluding ignition system, primary generating system, required communication and navigation system, as well as primary flight instruments	Yes	Yes	Yes
		Fuses — replacement using the correct rating	Yes	Yes	Yes
25	Equipment	Safety belts — replacement of safety belt and harnesses	Yes	Yes	Yes
		Seats — replacement of seats or seat parts not involving disassembly of any primary structure or control system	Yes	Yes	Yes
		Non-essential instruments and/or equipment — replacement of self-contained, instrument-panel-mounted equipment with quick-disconnect connectors	Yes	Yes	Yes

		Removal and installation of non-required instruments and/or equipment	Yes	Yes	Yes
		Wing wiper, cleaner — servicing, removal and reinstallation not involving disassembly or modification of any primary structure and/or control	Yes	Yes	Yes
		Static probes — removal or reinstallation of variometer static-and-total-energy compensation probes	Yes	Yes	Yes
		Oxygen system — replacement of portable oxygen bottles and systems in approved mountings, excluding permanently installed bottles and systems	Yes	Yes	Yes
		Air brake chute — installation and servicing	Yes	Yes	Yes
		ELT — removal/reinstallation	Yes	Yes	Yes
26	Fire protection	Fire warning — replacement of sensors and indicators	N/a	Yes	Yes
27	Flight control	Gap seals — installation and servicing if no complete flight control remova is required	Yes	Yes	Yes
		Control system — measurement of the control system travel without removing the control surfaces	Yes	Yes	Yes
		Control cables — simple optical inspection for condition	Yes	Yes	Yes
		Gas dampener — replacement of gas dampener in the control or air brake system	Yes	Yes	Yes
		Co-pilot stick and pedals — removal or reinstallation where design provides for quick disconnect	Yes	Yes	Yes
28	Fuel system	Fuel lines — replacement of prefabricated fuel lines fitted with self-sealing couplings	N/a	Yes	No
		Fuel filter — cleaning and/or replacement	N/a	Yes	Yes

31	Instruments	Instrument panel — removal and reinstallation provided that it is a design feature with quick disconnect, excluding IFR operations	Yes	Yes	Yes
		Pitot-static system — simple sense and leak check	Yes	Yes	Yes
		Instrument panel vibration damper/shock absorbers — replacement	Yes	Yes	Yes
		Drainage — drainage of water drainage traps or filters within the pitot-static system	Yes	Yes	Yes
		Flexible tubes — replacement of damaged tubes	Yes	Yes	Yes
32	Landing gear	Wheels — removal, replacement and servicing, including replacement of wheel bearings and lubrication	Yes	Yes	Yes
		Servicing — replenishment of hydraulic fluid	Yes	Yes	Yes
		Shock absorber — replacement or servicing of elastic cords or rubber dampers	Yes	Yes	Yes
		Shock struts — replenishment of oil or air	Yes	Yes	Yes
		Landing-gear doors — removal or reinstallation and repair including operating straps	Yes	Yes	Yes
		Skis — changing between wheel and ski landing gear	Yes	Yes	Yes
		Skids — removal or reinstallation and servicing of main, wing and tail skids	Yes	Yes	Yes
		Wheel fairings (spats) — removal and reinstallation	Yes	Yes	Yes
		Mechanical brakes — adjustment of simple cable-operated systems	Yes	Yes	Yes
		Brake — replacement of worn brake pads	Yes	Yes	Yes
		Springs — replacement of worn or aged springs	Yes	Yes	Yes

		Gear warning — removal or reinstallation of simple gear-warning systems	Yes	Yes	Yes
33	Lights	Lights — replacement of internal and external bulbs, filaments, reflectors and lenses	N/a	N/a	Yes
34	Navigation	Software — updating of self-contained, instrument-panel-mounted navigational-software databases, excluding automated flight control systems and transponders, and including update of non-required instruments/equipment	Yes	Yes	Yes
		Navigation devices — removal and replacement of self-contained, instrument-panel-mounted navigation devices with quick-disconnect connectors, excluding automated flight control systems, transponders, primary flight control system	Yes	Yes	Yes
		Self-contained data logger — installation, data restoration	Yes	Yes	Yes
51	Structure	Fabric patches — simple patches extending over no more than one rib, and not requiring rib stitching or removal of structural parts or control surfaces	Yes	Yes	Yes
		Protective coating — application of preservative material or coatings where no disassembly of any primary structure or operating system is involved	Yes	Yes	Yes
		Surface finish — minor restoration of paint or coating (where the underlying primary structure is not affected), including application of signal coatings or thin foils as well as registration markings	Yes	Yes	Yes
		Fairings — simple repairs to non-structural fairings and cover plates that do not change the contour	Yes	Yes	Yes
52	Doors	Doors — removal and reinstallation	Yes	Yes	Yes
53	Fuselage	Upholstery, furnishing — minor repairs which do not require disassembly of primary structure or operating systems, or interfere	Yes	Yes	Yes

		with control systems			
56	Windows	Side windows — replacement if no riveting, bonding or any special process is required	Yes	Yes	Yes
		Canopies — removal and refitment	Yes	Yes	Yes
		Gas dampener — replacement of canopy gas dampener	Yes	Yes	Yes
57	Wings	Wing skids — removal or reinstallation and service of lower wing skids or wing roller including spring assembly	Yes	Yes	Yes
		Water ballast — removal or reinstallation of flexible tanks	Yes	Yes	Yes
		Turbulator and sealing tapes — removal or reinstallation of approved sealing tapes and turbulator tapes	Yes	Yes	Yes
61	Propeller	Spinner — removal and reinstallation	N/a	Yes	Yes
71	Power plant installation	Removal or installation of power plant unit including engine and propeller	N/a	Yes	No
		Cowling — removal and reinstallation not requiring removal of propeller or disconnection of flight controls	N/a	Yes	Yes
		Induction system — inspection and replacement of induction air filter	N/a	Yes	Yes
72	Engine	Chip detectors — removal, checking and reinstallation provided that the chip detector is of a non-electrically indicated self-sealing type	N/a	Yes	Yes
73	Engine fuel	Strainer or filter elements — cleaning and/or replacement	N/a	Yes	Yes
		Fuel — mixing of required oil into fuel	N/a	Yes	Yes
74	Ignition	Spark plugs — removal, cleaning, adjustment and reinstallation	N/a	Yes	Yes
75	Cooling	Coolant — replenishment of coolant fluid	N/a	Yes	Yes
76	Engine controls	Controls — minor adjustments of non-flight or propulsion controls whose operation is	N/a	Yes	No

		not critical for any flight phase			
77	Engine-indicating system	Engine-indicating system — removal and replacement of self-contained instrument-panel-mounted indicators that have quick-release connectors and do not employ direct reading connections	N/a	Yes	Yes
79	Oil system	Strainer or filter elements — cleaning and/or replacement	N/a	Yes	Yes
		Oil — changing or replenishment of engine oil and gearbox fluid	N/a	Yes	Yes

Part D — PILOT-OWNER MAINTENANCE TASKS for BALLOONS/AIRSHIPS

Area and task	Hot-air airship	Hot-air balloon	Gas balloon
A) ENVELOPE			
1) Fabric repairs — excluding complete panels (as defined in, and in accordance with, the type certificate holder (TCH) instructions not requiring load tape repair or replacement	Yes	Yes	NO
2) Nose line — replacement	Yes	N/a	N/a
3) Banners — fitment, replacement or repair (without sewing)	Yes	Yes	Yes
4) Melting link (temperature flag) — replacement	Yes	Yes	N/a
5) Temperature transmitter and temperature indication cables — removal or reinstallation	Yes	Yes	N/a
6) Crown line — replacement (where permanently attached to the crown ring)	No	Yes	N/a
7) Scoop or skirt — replacement or repair (including fasteners)	Yes	Yes	N/a
B) BURNER			
8) Burner — cleaning and lubrication	Yes	Yes	N/a
9) Piezo igniters — adjustment	Yes	Yes	N/a
10) Burner jets — cleaning and replacement	Yes	Yes	N/a
11) Burner frame corner buffers — replacement or reinstallation	Yes	Yes	N/a
12) Burner valves — adjustment of closing valve not requiring special tools or test equipment	Yes	Yes	N/a
C) BASKET AND GONDOLA			
13) Basket/gondola frame trim — repair or replacement	Yes	Yes	Yes
14) Basket/gondola runners (including wheels) — repair or replacement	Yes	Yes	Yes

15) External rope handles — repair	Yes	Yes	Yes
16) Seat covers, upholsteries and safety belts — replacement	Yes	Yes	Yes
D) FUEL CYLINDER			
17) Liquid valve — replacement of O-rings in the outlet	Yes	Yes	No
E) INSTRUMENTS AND EQUIPMENT			
18) Batteries — replacement of batteries for self-contained instruments and communication equipment	Yes	Yes	Yes
19) Communication, navigation devices, instruments and/or equipment — removal and replacement of self-contained, instrument-panel-mounted communication devices with quick-disconnect connectors	Yes	Yes	Yes
F) ENGINES			
20) Cleaning and lubrication not requiring disassembly of other than non-structural items, such as cover plates, cowlings and fairings	Yes	N/a	N/a
21) Cowling removal and refitment not requiring removal of the propeller	Yes	N/a	N/a
22) Fuel and oil strainers and/or filter elements — removal, cleaning and/or replacement	Yes	N/a	N/a
23) Batteries — replacement and servicing (excluding servicing of Ni-Cd batteries)	Yes	N/a	N/a
24) Propeller spinner — removal and installation for inspection	Yes	N/a	N/a
25) Power plant — removal or installation of power plant unit including engine and propeller	Yes	N/a	N/a
26) Engine chip detectors — removal, checking and replacement	Yes	N/a	N/a
27) Ignition spark plug — removal or installation and adjustment including gap clearance	Yes	N/a	N/a

28) Coolant fluid — replenishment	Yes	N/a	N/a
29) Engine controls — minor adjustments of non-flight or propulsion controls whose operation is not critical for any flight phase	Yes	N/a	N/a
30) Engine instruments — removal and replacement	Yes	N/a	N/a
31) Lubrication oil — changing or replenishment of engine oil and gearbox fluid	Yes	N/a	N/a
32) Fuel lines — replacement of prefabricated hoses with self-sealing couplings	Yes	N/a	N/a
33) Air filters (if installed) — removal, cleaning and replacement	Yes	N/a	N/a

4. Individual comments and responses

(General Comments)	-

comment	*1* comment by: *Persjo* I agree to all proposed changes of Part-M light and whould welcome those possibiitys in Sweden
response	

comment	*5* comment by: *Guillaume SUDRE* Thank you very much for releasing this NPA. I think that this "Light Part-M" solves much of the issues that general aviation maintenance is facing. However, I think that this amendment still leaves one door open to national aviation authority regarding aircraft maintenance. Let me explain. Today, although all ELA 2 aircraft are maintained under "regular Part-M", there is still additional maintenance requirements set-up by national aviation authorities. Most of these additional requirements existed before 2003 but continued to exist after Part-M was set up. Here is a non exhaustive list : • A French registered aircraft must be weighed every 5 years (while there is no such thing in Part-NCO) • A German registered aircraft must undergo a full (expensive!) avionics check every year in order to fly IFR (nothing in Part M / Part-NCO) • A UK registered aircraft must have an avionic check every 36 months, VFR or IFR. • Some National Aviation Authorities (Sweden ?) states that when a service bulletin is declared "mandatory" by a DAH, it must be complied with (even when the SB is not covered by an AD !) Does that means, aircraft manufacturer are now a new regulation authority ? • France uses block to block time to perform time based (hours in service) maintenance while most other countries choose airborne time. • ..... Basically, even if today there is only one EASA "Part-M" most of the EASA member states made their own "Part-M". These various requirements have no safety grounds and don't make sense under EASA (why should avionic be tested every 12 months in Germany or every 36 months in the UK while a UK registered ELA2 aircraft can fly freely in Germany ?). When there is a safety issue that needs to be adressed, I'm in a favor of a new regulation to fix it. But, as of today, is there really safety records that shows • UK registered aircraft are most likely to be out of weight and balance because they

are not re-weighed every 5 years ?
- UK registered aircraft are most likely to suffer from radio and navigation problem as it's avionics is not being fully tested every year ?

This explains why EASA Part-M is so unpopular among general aviation in europe : Instead of replacing previous national regulations with a new one, it appeared as "another new layer of regulations" with no bennefits over the national regulation.
After reading this "Light Part-M", I fear that this issue is still not adressed (national requirements exist with Part-M, they will continue to exist with Part-M light)

I think there is two possibilities to solve this issue :

1. * Amend basic regulation and state clearly that for aircraft maintained under "Part-M Light", only EASA regulations are binding and that national aviation authority can only issue recommandations.
   * When the implementation of a rule is not clear for a national aviation authority, the NAA should contact EASA which should issue a letter of interpretation (and update AMC/GM as neccessary).
   (this is what the FAA does... and it works.)

   OR

2. Create an EU aircraft registration, where only EASA rules apply (and not "made-up rules").

Thank you for taking my input in consideration.

response

comment *10* comment by: *EUROCONTROL*

The EUROCONTROL Agency does not have comments on NPA 2015-08.

response

comment *221* comment by: *Hermann Spring*

Attachment #1

Scope
This document is a general input to the Notice of Proposed Amendment (NPA) 2015-08, (Part-ML).
It confirms that the NPA is a welcome improvement, which needs some further optimisation.
The comments are based on > 45 Years hands on experiences as maintenance staff, as well as head of the system engineering group for customisation and also development of total new aircraft. In a later phase as in project management within this environment of an aircraft manufacturer.
This experience is paired with 6500 hrs as pilot and instructor on SEP, TMG and about 150 hrs GLI, which were collected outside of the full time employment in the jobs above. Hands

on maintenance including modifications as holder of a maintenance licence (today Part 66) since 43 years.

Summary

The development of Part-ML goes in the right direction and the definitions are quite well balanced.

The content is related to the activities for aircraft maintenance, if it positive explained to the user, it could become a welcome supporting document for the maintenance staff.

However, the readability of the Part-ML is not yet optimal for the maintenance staff.

I believe that it was not adequate considered, who should read and apply Part-M light. Should it support the lawyers or the mechanics? I strongly propose to optimize it for the maintenance staff, this would vastly reduce the engagement of the lawyers.

Authors should be persons who have several years' practical experience on ELA1 and EAL2 aircraft as responsible maintenance and holder of a Part 66 licence.

Keep in general documents short, start with the basics (Maximum 10) and show the benefit of its purpose.

When a new aircraft is developed, a phase with experimental test flying is required. A similar concept should be applicable for new rules and regulations

An introduction in steps starting with a limited group with adequate monitoring should be envisaged.

Based on this approach, I apply, that

Part-ML shall be amended as follows:

Deviations to Pat-ML for special cases and further developments (Innovations) be supported by local authority and EASA.

EASA and local authorities shall establish a point of contact for these issues and regular workshops for continues development and updating similar as for the aircraft are defined in the *Instructions for Continued Airworthiness (ICA)*

Part-ML introduces reduced requirements for maintenance with licenced personnel. What is missing, that the regulation for Part145,M-F&G, 66,147 are adapted accordingly. **An urgent next step shall be, the that the requirements for approved maintenance small enterprises, but as well medium ones, will be adapted to the benefit of Part-ML.**

Discussion

Judgement of the NPA 2015-08

This Part-ML is quite well balanced, but a trial in a controlled and monitored environment is missing.

Further optimization shall be envisaged, when recognized, that there is more room for improvement.

Quantum leaps, such as 10 years ago the introduction of the initial Part-M (on fit for all etc.) with huge negative impacts should never happen again.

The change with Part-ML is welcome, but 10 years too late, that means it is coming long after the damage happened. Unfortunately, were warnings before their implementations ignored.

Layout and readability of Part-ML

The maintenance staff is the process owner of the Part-ML activities and this fact should be much more considered, when new documents are developed. Part-ML should be written in manner, that maintenance staff like it, if it is layout a useful tool, which support them to keep the aircraft in a safe condition.

My colleagues maintaining our ELA1 and ELA2 aircraft refused to read and to comment NPA 2015-08 it was classified by them as to complicated.

I do not agree, but I understand their objections, which are based on the negative experiences with Part-M application for the low end of the General Aviation (ELA1 & ELA2).

The aim must be to keep it simple and easy readable by the main user of these documents.
What should be avoided or specially considered?
Any kind of frustration would have a negative impact to the process. Too expanded Regulations, and a lot of rules are creating demotivation and this would result in minimizing the overall and safety attention of the maintenance staff.
The structure should be improved. Basic considerations and the aim of the regulation should be explained at the begin in a motivating manner.
Do not list the no-goes, remain on the positive side with how-to-do. Overloading with too much information shall be avoided (reduced to maximum efficiency).
Keep documents short, start with the basics (Maximum 10) and show the benefit of its purpose.

Involvement of Pilots and Owner in the maintenance

Accepting that more maintenance actions are carried out by less experience persons such as owner and operators may be judged as an increasing risk and be seen as a negative safety aspect.
yes, it may happen, that an incident will be based on poor maintenance due to lack of maintenance skills.
But the opposite my happen much more. The pilots and owners learn their aircraft much better knowing, which would result in safer operation.
Concluding this, I believe that the balance is on the positive side for more pilot/owner maintenance involvement. This judgment is based on my experience over decades' whit the Glider maintenance, where we did the complete maintenance with glider pilots of the glider club or with the owners. I observed, that these persons were very motivated and as they would be personally in danger by improper work, they took more time and tried always to do achieve on best level.
Nearly no accidents are known, which are based on unskilled maintenance during several decades.

Adaptation of approved maintenance enterprises, small but as well medium ones

I appreciate the liberalization of the leisure and light aircraft aviation sector with the introduction of Part-ML.
It is however alarming that approved maintenance enterprises, small but as well medium ones, are endangered to be pushed out of business, because the regulation for Part145, M-F&G; 66,147 does still not fulfil the three basic requirements of: proportionality, risk based and performance based.
The vanishing of SME's together with the dramatic reduction of training young people into maintenance is in itself a very unsafe development and must be reversed as soon as possible by better regulation as demanded by the EU in its paper: *:* ec.europa.eu/smart-regulation/better_regulation/documents/com_2015_215_en.pdf
A swift and powerful changes of the BR 216/2008 to support SME's is required very urgent.

Human performance and social aspects

In the area of the ELA1 and ELA2 aircraft maintenance and operation are the number of involved persons often very low. If an owner & operator maintaining his aircraft himself, then is a single person for all task responsible. The same person flying this aircraft has highest interest to return safe, as he personal would suffer under an incident or accident.
The majority are probably pilot and members of clubs. They exchange their experiences quite well and it is there a normal and very useful process supporting the safety aspects very well. There is no need for complicated formalities.
A good relation and constant dialog between authorities and the clubs, such as Aero-Clubs; AOPA; Experimental and Light Sport Aircraft Clubs etc. shall be maintained and improved.
A cooperative approach combined with an open dialog will support the safety enhancement

in the most efficient way.
Recent activities of EASA are supporting this approach and are well appreciated.
Introduction of changes and continuous improvements
For special cases deviations and further developments (Innovations) should be **supported** by local authority and EASA.
The applicant shall provide a simple and balanced, but complete project definition containing:
1. 1. Aim of the change (or reason for deviation)
2. Definition of the change, technical, operational, documentation
3. Safety aspects for all phases of the project, concept for updating during the project
4. Certification aspects, certification compliances, might be dived into several steps
5. Project controlling, involvement of authorities and third parties (supporting experts etc.)
6. Responsibilities
Conclusion
Part-ML as per NPA 2015-08 should be introduced as soon as possible, at the begin with minor adaptions.
It is in addition very urgent, that approved (maintenance) enterprises, small but as well medium ones will be adapted to the level of Part-ML.
Finally, **SIMPLER**, **LIGHTER**, BETTER will reaming a continuous task to keep a safe **General Aviation**.
Therefore, should Part-ML be further improved, with a constant dialog between authorities, maintenance staff and pilots.
Innovations and changes shall be welcome and if possible, they should be introduced in trial, to prove the expected result, similar as with a new aircraft development, where flight testing is an established process.

response

comment *223* comment by: *CAA-NL*

General Comment
The Netherlands supports the process of the GA Task Force and the attempts to create more proportionate regulation for the GA related to the risk hierarchy defined some time ago in the EASA committee. This is in line with the general development in society to give individuals more opportunities to bear responsibilities. Responsibilities to make a risk assessment and a personal decisions on circumventing superfluous margins within the general system and take mitigating measures tailored to the personal circumstances. However society also expects from the regulator that these will not enlarge the risks for innocent bystanders who are not involved in the process. In this NPA the owner/operator is given a number of possibilities to simplify the requirements which have to be complied with, tailor these with his/her personal mitigating measures and thus save costs, even at a possible greater personal risk. The new minimum standards to be followed need to guarantee a certain external safety level. The RIA should be clear about this.
With regards to the creation of Annex VI Part-ML laying down a simple set of rules for the general aviation, this Annex is a positive step in making the rules better understandable for all stakeholders. For even a still better and unambiguous understanding by the GA pilot/owner there should be only one part M and one Part ML with possible alleviations. The related changes made to Part M with regulation 1088/2015, limited to ELA1 not used for

commercial operations, should then be deleted again from Part M. It should not be possible to state to follow Part M while using all the current alleviations for an ELA1 aircraft and thus actually complying with the standards of ML but suggesting to comply with the full set of rules.

With regards to responsibilities, and possibilities certain articles of Part-ML refer back to Part-M (for instance in the case of commercial operations or the voluntary use of an CAMO). This cross referring implies a possibility to use the general standards of Part M including the safequards built into these standards. So the choice for ELA2 aircraft and small helicopters between Part M and ML at the level of the cover regulation as given in the amended article 3 is not necessary.

Therefore we want to delete all current alleviations for ELA1 from Part M and have Part ML applicable for ELA2 and small helicopters and all aircraft above have to follow Part M. A text suggestion amending the Cover regulation has been entered in the CRT.

response

comment *289* comment by: *Luftfahrt-Bundesamt*

Comments to proposal in general
With regard to the proposals contained in NPA 2015-08 we would like to offer following general comments:

Complexity of regulation
The efforts to achieve "clear and simple" set of rules for the GA community are very much welcomed and supported. Nevertheless, after review of the a.m. NPA we are not fully convinced that the drafted approach would achieve the objectives detailed in the Explanatory Notes. It should be noted that this NPA tries to achieve its objective of "simplification" by adding yet another 22 pages of new rules and 26 pages of AMC/GM Material to the already existing regulations. In our view the complexity of the regulation and therefore the system of ensuring continued airworthiness of aircraft under Regulation (EU) No. 1321/2015 would further inflate with yet some other possible options of implementation. While the proposal might result effectively in "simplifications" for a considerable group of applicants under certain conditions, for the overall system it would require (both on the side of applicants and especially authorities) to be ready to understand/decide/administer etc. these additional options, causing additional need for training, procedures, oversight processes, personnel etc. There is no specific consideration to that regard in the Explanatory Notes.
Furthermore we are not in a position to indicate agreement, as the proposal for a "Light Part-M" would require additional rework of the existing "Part-M", which is not indicated in NPA 2015-08 (It should be assumed that the previous Phase I results, currently contained in Part-M, would be restored within this new NPA as ELA2 include ELA1 aircraft).

However the requirement to follow a more holistic approach will be subject to further RAG discussions in 2015/2016; and this Part-ML-draft should also be seen in this context:
Although for obvious reasons there has been made reference to Part-NCO rather than using the wording commercial / non-commercial, we feel that the requirements of Air Ops

(especially when Part-ORO has to apply) should better match with related airworthiness requirements.
Furthermore there have been introduced aircraft categories namely ELA1, ELA2 and CMPA. For the sake of simplification it should be avoided to introduce new categories such as "ELA2 aircraft and helicopters certified for up to 4 occupants and up to 1.200 MTOM" or "sailplanes, balloons, hot-air airships and ELA1 aeroplanes (operated under Part-NCO)". Please note that Part-M already contains several categories of aircraft on top of ELA1 / 2 such as in M.A.502, M.A.803 or M.A.901.
Finally the requirements of Part-M and Part-ML should match with the actually still unknown new definition of "commercial operation" as per draft of the Basic Regulation.
Information on affected aircraft population in Germany
The affected aircraft population on the German register would include between 18.000 to 19.000 aircraft (ELA2 and ELA1) (for statistical details on aircraft registered in Germany see: http://www.lba.de/DE/Presse_POE/Statistiken/Statistik_Luftfahrzeuge.html?nn=700678).

Specific placard for Part-ML a/c
With the elaborated objectives in the Explanatory Notes in mind, it is difficult to understand the question concerning specific marking and passenger information on page 9 of the NPA. As the Explanatory Notes consider the proposals of the NPA as "safe", why should there be a placard / information that they are "not as safe as …"? Since the Basic Regulation already defines the objective to "to establish and maintain a high uniform level of civil aviation safety in Europe" the paying passengers should be able to rely on this statement also in regard to Part-ML.

No Part-ML for commercial operation
We do not support the application of a "Light Part-M" to commercial operations. Commercial operations should always comply with Part-M. It is the objective of Part-ML to simplify the rules for GA (not for commercial operations). In addition, to bring in exemptions/special requirements for commercial operations as currently proposed makes the new rules more complicated and difficult do understand, especially for the focused public. Therefore the proposed change to Article 3 of Reg. (EU) No. 1321/2014 should be adapted so that the proposed Part-ML and AMC/GM Material would only apply to ELA1/ELA2 aircraft and rotorcraft certified for a max. of up to 4 passengers and up to 1200kg MTOM used for non-commercial operations.

Need for ARC
Concerning the items raised on pages 12/13 of the NPA we would like to provide the following input:
With the regard to the issue of elimination of the ARC, we do not see any real simplification, as the ARC would be replaced by (yet another, new) special kind of CRS, while the technical and procedural aspects of the ARC would be kept (as a conclusion/review of the previous history of the aircraft a "yearly statement of airworthiness").

Future need for AMP
The need for a maintenance program for non-commercial operation of GA aircraft has been questioned from our side already in past comments to previous NPAs. Maintenance should be and normally is based in principle on the airworthiness directives, TCDS information and ICA. With the specific aircraft files this should be sufficient to perform the required maintenance of the aircraft without re-writing the content of the above mentioned documents in an individual AMP. As P/O maintenance tasks are also sufficiently defined in

Part-M, any further tasks are taking place under the responsibility of a technically competent and approved organisation (or sometimes licensed person), which would review the P/O tasks performed, and certify maintenance performed and the yearly review in accordance with approved procedures. In addition, where deviations from ICA may apply, an approved maintenance organisation would provide technical justification through application of approved procedures and technical inspections and record all necessary data in the aircraft documentation. Furthermore, all repairs and modifications must be done according to the applicable standard and parts installed must be airworthy, evidenced by respective documents.
This approach will in our view put more emphasis on the technical condition and technical inspection of the aircraft, rather than overwhelming the owner and the approved maintenance organisations with paper requirements for each individual aircraft.

Moving aircraft under Annex II
Rather than removing certain balloons or other a/c from the applicability of the basic Regulation into Annex II, it should be considered whether to establish a frameset for GA aircraft, where national authorities would gain full regional/national competence for this kind of aircraft with sufficient flexibility on the one side and common frame of regulations/processes under the basic regulation to ensure mutual recognition on the other side.

CAMO requirements for commercial operations
With regard to the CAMO requirements for commercial operations, we are of the view that the operator should be required to demonstrate sufficient competence to ensure that its fleet of aircraft is kept in an airworthy condition, being it a large or a small fleet. This would at least require the competences of a CAMO in the current setting of rules.

Clear cut between Part-M vs. Part-ML
Concerning the option of owners/operators to apply Part-M vs. Part-ML we are not content with the mix of possibilities/options currently foreseen with the NPA proposals. The application of Part-ML vs. Part-M should be as clear-cut and simple as possible with regard to the owner/operator but also with regard to the administrative burden linked to each individual additional combination of options for the authorities, CAMOs and MOs. The current approach is therefore far from an optimum since it would require to provide support for multiple approaches and double/triple/… standards to achieve essentially the same outcome (AMP, ARC …). This in turn would very likely have an effect on fees and charges.
We would see a need for the following considerations, which would lead to significant changes in the current proposal:
- Emphasize that Part-ML is generally the required approach to ELA1/ELA2 aircraft and rotorcraft certified for a max. of up to 4 passengers and up to 1200kg MTOM
- Exception: owner may decide to apply Part-M in full (instead of Part-ML), including approval of AMP by authority (or CAMO through indirect approval procedure) i.a.w. Part-M
- Part-ML does not apply to a/c for commercial operations
- Only option for the approval of an AMP under Part-ML is the self-declaration (with possibility of support of services by a CAMO and/or MO, no contracting of responsibility possible since owner/operator assumes full responsibility by declaration)
- A self-declared AMP under Part-ML requires owner/operator to manage airworthiness (with possibility of support of services by a CAMO and/or MO, no contracting of responsibility possible since owner/operator has declared full responsibility through self-declaration)

- No approval of an AMP under Part-ML by the authority or by the CAMO by means of an indirect approval procedure
- We do not see any need for the documentation in official docs, whether the owner/operator decides to comply with Part-ML or Part-M instead, this would be sufficiently clear through the kind of AMP.

Identical requirements in Part-M and Part-ML
A large portion of text in the proposed Part-ML is copied from the existing Part-M requirements. While it is understood that this approach has been the preferred option to have a one book approach for the user, reference is still made to Part-M in some cases and there is a significant overlap that needs to be taken into account for future "housekeeping". A different approach adding clarity and simplification to the existing Part-M as a whole would have been preferable from our point of view and remains an open task.

response

comment *302* comment by: *The Norwegian Air Sports Federation*

The Norwegian Air Sport Federation *Norges luftsportforbund*, (NLF), is the umbrella organisation for all air sports activities in Norway, and has a membership figure of approx. 17.000 spread across approx 270 air sports clubs.

NLF also owns and operates a CAMO (NLF CAMO), being responsible for more than 120 light aircraft and 90 sailplanes.

NLF has worked with Europe Air Sports (EAS) in drafting a common response. Except where the two organisations have comments with clearly different content, NLF hereby endorse all comments to the proposals as submitted by EAS.

NLF would like to thank the Agency for preparing this new set of maintenance regulation, which we believe addresses the majority of the concerns of the current regulation. We see a need for some optimisations and clarifications, but as far as the main principles are concerned, we believe the suggested approach is the right way forward.

response

comment *331* comment by: *CAA Finland*

CAA Finland is in favour of the introduction of Light Part-M

response

comment *390* comment by: *Swedish Transport Agency*

The general impression is that we support the proposed changes of (EU) 1321/2014 to include ELA2 and helicopters up to 1200 kg MTOM.

STA do **not** support the change to include ELA2 and helicopters for aircraft used by licenced air carriers in accordance with Regulation (EC) No 1008/2008.

For aircraft used by licenced air carriers in accordance with Regulation (EC) No 1008/2008, passengers and pilots expect certain level of safety due to the operation.

response

comment *432* comment by: *The Finnish Aeronautical Association*

The Finnish Aeronautical Association agrees with the main goals of this NPA and welcomes it as a step in the right direction. But please see our comments to specific issues.

response

comment *436* comment by: *Dutch gliding association*

Viewpoint: it is unnecessary to apply extra markings on the aircraft. After all the aircraft is maintained according to manufacturers / TC-holders / EASA instructions. Thus it should be save.

response

comment *449* comment by: *René Meier, Europe Air Sports*

Europe Air Sports (EAS) with its 680'000 members organised in national aero-clubs and European federations welcomes this NPA and thanks the Agency for preparing it. Powered flight and sailplanes operations are primarily within the scope of the future provisions, so particularly European Gliding Union (EGU) and European Powered Flying Union (EPFU) contributed to the comments we hereby submit.

We recognise to be at the point of departure form "Part-M", a set of provisions that for many years was heavily contested by our communities because of its inherent lack of appropriateness to aircraft maintenance processes fitting sports and recreational aviation, non-commercial operations with other than complex motor-powered aircraft.

The proposals presented by this NPA indicate the right direction to be followed in future. We are, however, still in the "en-route" phase, not on "short final". More work needs to be done to really put provisions in place covering our needs.

Our comments are based on the risk hierarchy published in "General Aviation Roadmap" as follows:

1. Uninvolved third parties
2. Farepaying passengers in commercial air transport(CAT)
3. Involved third parties (e.g. air show spectators, airport ground workers)
4. Aerial work participants / Air crew involved in aviation as workers
5. Passengers ("participants") on noncommercial flights
6. Private pilots on noncommercial flights

As a principle, all regulation should be screened against the backdrop of the above risk hierarchy and resulting need for protection.

Airworthiness concerns to both ELA1 and ELA2 aircraft (operated under Part--NCO) will affect the identical levels in the risk hierarchy, i.e. level 5 and 6 (passengers and privat pilots on noncommercial flights). For uninvoled third parties he difference between ELA2 aircraft and the other cateogories actually included in the provision is negligible. We believe this already is a common position, as we read on page 8 of NPA 2015-08 that the consequences on uninvolved third parties of an accident of an ELA2 aircraft larger than ELA1 are not expected to be much different from those stemming from an accident of an ELA1 aircraft. Similar conclusions can be reached for an accident involving helicopters certified for up to 4 occupants and up to 1 200 kg MTOM.

We offer the Agency our cooperation, it is in our interest to having prepared decent provisions for aircraft maintenance fitting the purpose of the scope of this NPA.

response

comment *452* comment by: *LAMA EUROPE*

LAMA EUROPE members appreciate EASA effort to introduce more appropriate and proportionate rules for GA. We are requiring this for many years. LAMA EUROPE was participating in the Part-M GA Task Force which helped to create this NPA.

Unfortunately we feel that even some of the offered alleviations and improvements in Part M Light are quite radical for normal GA, for the lighter end of GA especially for the LSA category are not sufficient. We did not make “the radical change”. Instead of this we tried to achieve almost impossible task – to simplify Part M, but keep its structure. The EASA Maintenance system is still too complicated for LSA.
Simplifying “bad” rule results usually in simplified bad rule, not in simple, proportionate rule. This frustration is clearly visible in the comments of the other GA Task Force Members expressed in Appendix I to II.

We support the ideas expressed in Appendix IV by Werner Scholtz, this could be used as very good basis to make really light continuing airworthiness regulation for light aircraft.

To conclude: This NPA 2015-08 is a good start, but this could not be a final solution for European light aircraft (at least not for LSA and sailplanes).
Based on our deep knowledge of microlight and US LSA environment we are sure that we can together find solution for simple maintenance based on the owner responsibility without unnecessary bureaucracy.

It would also be good if EASA can coordinate with the FAA so we have one global standard.

LAMA EUROPE main area of interest is LSA, but in the area of CS-23 we closely cooperate with GAMA and we support their comments. Concerning the LSA we would like to point out that there is strong need for One Global System for LSA and we would like to offer to EASA our cooperation and help in achieving this ambitious goal. So far the develepment in this direction is not satisfactory.
LAMA EUROPE offers cooperation on further improvement of Part M Light.

response

comment *484* comment by: *Danish Transport and Construction Agency*

Denmark opposes to the inclusion of Commercial Air Transport in the proposed alleviations for the continuing airworthiness requirements for the following reasons:

The safety targets for Commercial Air Transport have always and should always be higher than the safety targets set for General Aviation.

In the case of Commercial Air Transport, passengers expect that the level of safety provided by these aircraft is higher than what can be expected from general aviation aircraft.

Also, the overview of the explanatory note to this NPA only relates to "general aviation", and Commercial Air Transport is not included in the definition of general aviation.

response

comment *485* comment by: *Luftsport Verband Bayern / Germany*

We appreciate the efford EASA has undertaken to develop the Part-ML. This part is much more adopted to the Light aircraft environment and much easier to read.
Nevertheless there are some differences to Part-M which will rise potential questions, which Part should be applied to the aircraft (refer to e.g. comments 184, 488 & 489). Not all these differences might be discovered right now and others may be incorporated when reworking the text in the comment response phase. So EASA should state somewhere in the AMC material a guideline, what should be done in case such differences between Part-M and Part-ML are discovered later on.

response

comment *486* comment by: *Luftsport Verband Bayern / Germany*

EASA should state somewhere in the AMCs, that applying the Part-ML does not prohibt the owner of an aircraft from using the services of a CAMO neither from a Part-MF organisation.

response

comment *490* comment by: *EFLEVA*

These comments represent the view of EFLEVA - **The European Federation of Light, Experimental and Vintage Aircraft.**

EFLEVA was founded by twelve associations, from eleven countries in July and October 2007.

Abstract of the statutes:"The purpose of the Federation is to promote, to support and to represent the interests of its Members at the European level, in respect of all relevant

regulatory matters.“The Federation will generally represent the interests of builders and restorers of aircraft and their operators.”

EFLEVA will act independently, but seeks to have good relations and work co-operatively with relevant national and international organisations.“Full Membership of the EFLEVA is open to Experimental, and Vintage aircraft organisations of countries which are Members of the European Civil Aviation Conference (ECAC).”

response

comment *530* comment by: *GAMA*

The General Aviation Manufacturers Association (GAMA) is an international trade association representing over 80 of the world's leading manufacturers of general aviation airplanes and rotorcraft, engines, avionics, components and related services. GAMA's members also operate repair stations, fixed based operations, pilot and maintenance training facilities and they manage fleets of aircraft.

GAMA appreciates EASA’s continued efforts to introduce more appropriate and proportional requirements for the General Aviation community. Specifically, the alleviations proposed in this NPA follow EASA’s GA Roadmap principles that include a transition to a risk based approach to oversight in order to reduce unnecessary burdens and help promote growth within the GA community. GAMA is a participant in the Part-M General Aviation Task Force and supports the concepts of the proposals contained within the NPA and offers the following general statements for consideration.

Further Expansion of Scope

GAMA recognizes that the efforts of the Part M general aviation task force are very significant improvements compared to the current requirements. They represent an acknowledgement that EASA recognizes the need to establish appropriate levels of safety requirements that consider proportionality regarding the specific segment of the General Aviation community.

While this NPA focuses on the lighter end of the general aviation community, EASA acknowledges that additional alleviations could be realized after experience is obtained through implementation of the proposed changes. To that end, GAMA recommends EASA consider continued improvements that would not limit this initiative only to the lightest end of general aviation but expand the proportionality to include additional non-complex aircraft, operated under Part-NCO or Part-SPO, in addition to certain rotorcraft. Not only would this expansion provide more proportionality to a broader spectrum of the GA community, but it would also provide increased harmonization with other regulators. GAMA would welcome the opportunity to participate in and help foster similar initiatives that are based on the principles of the GA roadmap and are intended to include an even broader category of GA aircraft.

response

comment *546* comment by: *GIPAG France (French General Aviation Operators Professional Union)*

The NPA 2015-08 introduces changes in comparison with:

- The Commission Regulation (EU) N°1321/2015,
- The Decision 2003/19/RM

The comments hereafter shall be considered as an identification of some of the major issues GIPAG France asks EASA to discuss with third-parties before any publication of the proposed regulation. In consequence, the following comments shall not be considered:
- As a recognition of the third-parties consultation process carried out by the European Parliament and of the Council;
- As an acceptance or an acknowledgement of the proposed regulation, as a whole or of any part of it;
- As exhaustive: the fact that some articles (or any part of them) are not commented does not mean GIPAG France has (or may have) no comments about them, neither GIPAG France accepts or acknowledges them. All the following comments are thus limited to our understanding of the effectively published proposed regulation, notwithstanding their consistency with any other pieces of regulation.

General Comments

GIPAG France thanks EASA to propose a "light Part-M" with requirements proportional to the significantly lower complexity.
However, GIPAG France would like to remind EASA that too much alleviations will decrease the safety and will give a misleading image of the sector.
GIPAG France noticed some serious issues on this amendment. Some of them are :
- The responsibilities of the owner Vs the responsibilities of the approved framework;
- The Minimum Inspection Program (MIP) Vs the Manufacturer Maintenance Program (MP) ;
- The privileges of an approved framework Vs an independent mechanic.

To conclude, the GIPAG France can't support this new regulation since all the negative effects are impacting GIPAG members as you well described it in the paragraph 2.3.4. Moreover the consequences of this new regulation on approved frameworks will both, create unfair competition and will discourage them to keep the approval and they will therefore prefer not to extend the approval. This is not what GIPAG France wants.

response

comment *572* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

General comments

The Federal Office of Civil Aviation (FOCA) appreciates the opportunity to comment on this NPA and congratulates the agency for this great work. The FOCA supports the process of the GA Task Force and the attempts to create more proportionate regulation for the GA related to the risk hierarchy defined in the EASA committee.

response

comment *605* comment by: *FNAM (French Aviation Industry Federation)*

FNAM (Fédération Nationale de l'Aviation Marchande) is the French Aviation Industry Federation / Trade Association for Air Transport, gathering the following members:
· CSTA: French Airlines Professional Union (incl. Air France)
· SNEH: French Helicopters Operators Professional Union
· CSAE: French Handling Operators Professional Union
· GIPAG: French General Aviation Operators Professional Union

· GPMA: French Ground Operations Operators Professional Union
· EBAA France: French Business Airlines Professional Union
And the following associated member:
· UAF: French Airports Professional Union

Introduction
The NPA 2015-08 introduces changes in comparison with:
- The Commission Regulation (EU) N°1321/2015,
- The Decision 2003/19/RM
The comments hereafter shall be considered as an identification of some of the major issues FNAM asks EASA to discuss with third-parties before any publication of the proposed regulation. In consequence, the following comments shall not be considered:
- As a recognition of the third-parties consultation process carried out by the European Parliament and of the Council;
- As an acceptance or an acknowledgement of the proposed regulation, as a whole or of any part of it;
- As exhaustive: the fact that some articles (or any part of them) are not commented does not mean FNAM has (or may have) no comments about them, neither FNAM accepts or acknowledges them. All the following comments are thus limited to our understanding of the effectively published proposed regulation, notwithstanding their consistency with any other pieces of regulation.

General Comments
FNAM thanks EASA to propose a "light Part-M" with requirements proportional to the significantly lower complexity.
However, FNAM would like to remind EASA that too much alleviations will decrease the safety and will give a misleading image of the sector.
FNAM noticed some serious issues on this amendment. Some of them are :
- The responsibilities of the owner Vs the responsibilities of the approved framework;
- The Minimum Inspection Program (MIP) Vs the Manufacturer Maintenance Program (MP) ;
- The privileges of an approved framework Vs an independent mechanic.

To conclude, the FNAM can't agree with this new regulation since all the negative effects are impacting GIPAG members as you well described it in the paragraph 2.3.4. Moreover the consequences of this new regulation on approved frameworks will both, create unfair competition and will discourage them to keep the approval and they will therefore prefer not to extend the approval. This is not what FNAM wants.

response

comment *637* comment by: *DGAC France*

DGAC France supports all the work performed by the Agency in order to simplify the requirements for general aviation so that the requirements are proportionate to this kind of operation.
The task performed by the Part M General Aviation Task Force in this Phase II seems well adapted for general aviation and in accordance with the majority of the stakeholders' wishes. Nevertheless, DGAC France has several concerns linked to the following:

1. The applicability of Part ML to all types of operation (see comment # 638)
2. The interest of the approved organisations, such as Part-MF, Part-MG and Part-145, facing the independent certifying staff (see comment #639)
The consistency between the alleviations to present Part-M linked to Phase I of the Part M General Aviation Task Force, that have been included in R(EU) n°2015/1088, and this new annex VI Part-M Light (see comment #640)

response

comment *638* comment by: *DGAC France*

The applicability of Part-ML to ELA2 aircraft and helicopters certified up to 4 occupants and up to 1 200kg MTOM seems adequate. Unfortunately, this NPA proposes the alleviations to all kind of operations, which therefore includes all commercial operations, even commercial air transport.
DGAC France estimates this proposal goes too far for the following two reasons.
First of all, the simplification concept defined in the GA Roadmap was built on the principle that it is acceptable for the safety level for general aviation to be lower than what is required for commercial activities, especially commercial air transport (CAT). For CAT, regulations must be established so that they guarantee a satisfactory level of safety for passenger that pay for a benefit. In this NPA the reduction of the level of safety does not seem acceptable for CAT.
Secondly, DGAC France is not convinced by the assumptions indicated in the NPA stating that the proposal is compliant with ICAO annexes, especially as concerns maintenance programmes. It is indicated in Annex 6 Part II (International General Aviation – Aeroplanes) that "2.6.1.4 The owner or the lessee shall ensure that the maintenance of the aeroplane is performed in accordance with **a maintenance programme acceptable** to the State of Registry" while in Annex 6 Part I (International Commercial Air transport – Aeroplanes) it is indicated that: "§ 8.3.1 The operator shall provide, for the use and guidance of maintenance and operational personnel concerned, **a maintenance programme, approved by the State of Registry**, containing the information required by 11.3." And it is exactly the same concept in § 6.3.1 of Section II and in § 6.1.1 d) of Section III of Annex 6 Part III (International Operations – Helicopter). Therefore in the case of a declared maintenance programme for an aircraft used in CAT operations, the proposal is not compliant to ICAO Annex 6.
Therefore DGAC France asks to reduce the scope of Part-ML to ELA2 aircraft and helicopters certified for up to 4 occupants and up to 1 200 kg Maximum Take-Off Mass (MTOM), operated under the Part-NCO rules.

response

comment *639* comment by: *DGAC France*

Although this NPA defines very interesting alleviations for general aviation aircraft owners and independent certifying staff, DGAC France believes that EASA forgets the small and medium-sized enterprises (SME) that have made efforts to obtain an organisational approval (Part-MF, Part-MG and Part-145). These SMEs are very important as very well qualified and safety relevant.
The system developed in this NPA is likely to reduce the interest of holding a maintenance organisation approval as an independent certifying staff can do the work alone without having the burden of audits, inspections, handbooks, etc.
DGAC France does not mean that the proposals in the NPA must not be taken into account

	but that it is absolutely necessary to give more privileges to approved organisations versus individuals (for instance, have the privileges of performing airworthiness reviews and issue ARCs in conjunction with the 100 h/annual inspection, for aircraft beyond ELA2), and at least to have the same level of authority supervision. A dedicated effort to address this issue is required in order to avoid the disappearance of such organisations. The regulatory change of R(EU) n°1321/2014 that will correspond to this NPA must take this issue into account.
response	

comment	*640* comment by: *DGAC France* For the aircraft in the scope of this NPA, it will be possible to choose between Part M and Part ML. Regulation 2015/1088 has introduced in Part M some equivalent changes to Part ML for ELA1 aircraft not used for commercial operations. It seems therefore inconsistent at the present time to have such alleviations in Part M, while included in Part ML. DGAC France therefore suggests withdrawing these alleviations introduced in Part M (for instance M.A.201(e)(ii) second indent, M.A.302(h) and M.A.302(i), M.A.901(g), M.B.301, Appendix VIII to Part M) Furthermore, it seems necessary to amend other items in Part M and Part 145 to be in compliance with the new Part ML, specifically the current limitation to ELA1 operated in non-commercial operations needs to be modified and also some references need to be changed (M.A.606(i) and M.A.606(j), M.A.615(e) and M.A.615(f), M.A.710(ga), M.A.901(l), Appendix IV in the table item 13, 145.A.30(k) and 145.A.30 (l), 145.A.75(f) and 145.A.75(g)).
response	

comment	*690* comment by: *European Sailplane Manufacturers* The European sailplane manufacturers appreciate very much the efforts, EASA has undertaken to establish the General Aviation Roadmap to create appropriate rules for small aviation. The sport and recreational aviation communities have expressed their frustration over more than 10 years about the "one size fits all" approach, the European aviation legislation has taken since 2003. With the GA roadmap and last but not least the efforts to improve continuing airworthiness regulation EASA is now on a good path to allow small aircraft like sailplane to be operated in a viable and responsible way. Nevertheless still a lot could be improved and even more could be done to inform stakeholders and authorities alike about better ways to handle certain issues. Nevertheless the sailplane manufacturers want to thank all organisations and persons alike for their efforts to go along the GA road toward "lighter and better rules for light aviation".
response	

comment

691 comment by: *European Sailplane Manufacturers*

On the very last page of this NPA, we, the sailplane manufacturers of Europe have been given the chance to dream a dream about a really light continuing airworthiness regime.

We sincerely believe that regulating the owner too much has not, does not and will not improve safety.
Why?
With regulation you will never reach the ones who will not hear or who are not responsible.
With complex regulation - especially the very complex regulations we see today and even on the complexity level of the proposed Part-ML - it is difficult to reach the interested and responsible ones, because anything too complex will not fully be understood.
And with too much regulation you always need entities to enforce who might have themselves no interest to look for safety in the first place but which are only looking that procedures are according to a book.

In all three cases safety is not improved, but only paperwork, effort and frustration is created.

For some years it was then often heard that this is still needed for the sake of "harmonisation" and "standardisation".
It was also heard that it will be okay because the balance of economies will make it work out.
Both is simply not true or needed in sport and recreational aviation as this needs some diversity and has no big money economical background.

Therefore we urge the regulators to allow maintenance rules to become much simpler than the proposed Part-ML (even if it indeed is a good step in the right direction).

The dream of this last page could only become true with some fundamental amendments in the Basic Regulation and we sincerely hope that EASA has got this message and helps to implement such changes.

Then this dream could become reality.

response

comment

692 comment by: *Austro Control*

General:

We highly welcome the initiative developing a ‘Light Part-M’ with requirements proportional to the significantly lower complexity and associated risks of the lighter end of the General Aviation community, and as clear and simple as possible in order to facilitate implementation. A further development of new and simpler regulations dedicated to specific aircraft balloons is highly recommended.

Feedback to questions:

Page 9

2.3.2, Question regarding the marking of Aircraft when using Part ML.
Comment: Not supported,
Justification: Part ML provides an adequate level of safety for this category of A/C and operations. Therefore no marking or information is required.

Page 11
2.3.7, Economic impact of Draft rule,
Comment /Justification: This alleviations will result in (to be quantified) cost reductions for the aircraft owners. This is also appreciated by ACG. Any effort to make GA more attractive for young pilots should be supported. :

Page 13
2.4. Question to amend the BR to include certain categories of Balloons in annex 2,
Comment: Not supported.
Justification We suggest that they should remain within the EASA System. The transfer to Annex II would mean that Authorities have to run parallel systems.

Page 13
2.4. Question to amend the BR to eliminate the need for a CAMO for Commercial OPS Aircraft,
Comment: Supported
Justification: The present M-G and M-I privileges may be achieved by a single Part ML (M/F?) organization regardless of the type of operation.

Comments specific to Subjects:

Minimum Inspection Program for Rotorcraft:
Page 26
ML.A.302d
Comment/Justification: Criteria's for the development of a minimum inspection program for helicopters are missing
Proposal: Develop and add a Minimum Inspection Program for Helicopters in ML.302 d.

Defect Release
Page 31
ML.A.403
Comment/Justification: The proposed Part M change is alone not clear enough to support a defect release by the pilot in MLA 403 (b)(3). The technical competence of the average GA pilot seems to be not adequate.
Proposal:
Definitions (AMC, GM) are needed for the terms: "hazard serious flight safety", "certifying staff not available"

Page 36
ML.A.901(b)4ii
Comment: Currently AR staff is qualified for the company approval only. There is no qualification record for outside environment which is needed for simple automatic recognition of his qualification when he moves within EU or companies.

Part M and Part 66 could not be seen separated as before.
For the future Phase 3 of the GA initiative in Part M (and Part 66) it shall be envisaged to include a way that the qualification of AR staff is recorded.
Justification: This record will enable the personal to get free movement between different companies in Europe without having an additional assessment. The AR Qualification should be included in the PART 66 License as a separate category. The companies would benefit from that by having standardized qualified personal.
Proposal: It is proposed that in Phase 3 of the Part M task force and Part 66 WG an Inspection authorization is entered into the Part 66 license by implementation of a new part 66 license category. Existing personal (Form 4) already assessed shall get credit for a Part 66 endorsement.
The Part 66 basic knowledge requirements and basic experience requirements have to be adopted accordingly for this inspection authorization.

Page 38
ML.A.905 Findings
Comment: MA710 h requires that all findings shall be closed for issuance of an ARC. ML.A 905 classifies findings. It is unclear why a Level II finding which is considered as non-safety critical should not remain open for a defined period. If ML.A 905 is only applicable for classification of findings issued by the competent authority we recommend to clearly identifying this within this Paragraph.
Justification: It is the intent to have a clear understanding of findings and their classification as well as the consequence of findings issued by the authority.
Proposal: Applicability of ML.A.905 “Findings” shall be clarified related to the simplicity of Part ML. It is questionable whether a Finding classification in Part M/L in that form makes sense.

Page 47
AMC ML.A:302(c) Guidance for TBO Extensions,
Comment: The list and classification is supported.

response

comment *719* comment by: *WWW.EC-FLY.COM*

EC-FLY is a Spanish consultancy that has been active in the GA field since 2004.

We have seen the steady decline of light-GA activity over the years concurrent with the increased burden that Part-M and Part-21 have meant for GA, while the desired effects in safety never materialized.

Too many of our customers have been overburdened by “paper-trail” issues that left them grounded for long times and whose resolution added little (if anything) to the safety of their operation, but substracted lots from their flight activity and their pocket, as rightly pointed out in section 2 of this NPA.

We thus welcome the whole EASA GA Task Force and in particular the recent implementation of CS-STAN and Phase1 of the Part-M task with simplification for ELA1, as well as the ongoing activities within the task force including this NPA.

However we trust the following comments may add some improvement to the effort in achieving its stated goals:

i) We do not believe amending Part-ML further to eliminate the need for an ARC is a relevant simplification and it definitely imposes a burden on transferability of aircraft. It is the ARC process whose burden we should consider, not whether it is issued in a standardized form or as part of the CRS for 100h/annual chk.
ii) In a similar way, we do not think the fact of complying with a maintenance program imposes a relevant burden in itself, it is the content, development and review of such program which causes a concern we should weight against its advantages. For example, under current Spanish AESA interpretation, maintenance programs should be reviewed FOUR times per year for possible variations in source/base documents, for ALL aircraft. See relevant recommendations below.
iii) "allowing independent certifying staff to perform airworthiness reviews and issue ARCs in conjunction with the 100 h/annual inspection, for sailplanes, balloons, hot-air airships and ELA1 aeroplanes operated under the Part-NCO rules" could be extended to ELA2 aircraft using the same safety impact reasoning in 2.3.2 items 3-6 of the NPA as well as the same beneficial impact.
iv) ARC form 15c issue2 should include provisions for non-part-66 holders (marked as 'other license holder-specify') so that even though the ARC cannot be used when exporting, at least the form is standardized facilitating maintenance as well as demonstrations of compliance when the aircraft is outside the country of reg.
v) MLA 302 a) should read "The recurring maintenance tasks of each aircraft…." (as opposed to "The maintenance of each aircraft…") . The maintenance program is not meant to specify all additional maintenance tasks like one-off repairs or AD's, or modifications or other tasks (other than pilot-owner maintenance), which also constitute "maintenance" and fall within the scope of MLA301.
vi) MLA 302 c) 7. In order to avoid potential abuse by any party the wording should be unambiguous that "The review must evaluate whether any of the discrepancies found on the aircraft since the previous review, or in the case it had never been reviewed, since the AMP was implemented, could reasonably be linked to deficiencies in the AMP, in which case the AMP shall be amended accordingly" rather than the proposed "If the review shows discrepancies on the aircraft linked to deficiencies in the content of the AMP, the AMP shall be amended accordingly." Otherwise some review staff may be inclined to recommend a change in the AMP because of a disagreement with its contents, regardless of the existence of evidence, even though the apparent intent of the proposed regulation is to do so in view of the evidence. This could potentially strain the owner-review staff/org-authority relationship, similar to the way we sometimes see MOR's used as commercial or personal tools. We think the amended wording minimizes such strain.
vii) MLA 304 must also include the MLA 401 maintenance data (as it may be issued by a non-Part-21 DAH)
viii) MLA 305 d) Records. Not all logbook systems have provisions to contain the data in MA 305 (d). We therefore suggest to add the following paragraph at the end of this section. "For owners and operators who do not to have an approved records system per M.A. 306, the above data must either be included in the MLA 305 b) 1) logbooks or in listings and/or reports that must be attached to the MLA 305 b) 1) logbooks and shall be considered an

integral part of them for the purposes of this SubPart."
ix) MLA 305 e) We suggest to reword to make it clear that such requirement only applies to those components in brackets, which seems to be the intent.
x) MLA 305 h) 4) We suggest to except the preflight check, which will in all cases be part of the AMP, from this requirement, as otherwise the number of entries would be unnecessarily high
xi) MLA 401 b) Suggest to include a fifth provision to include the AMP, "(5) The MLA 302 AMP" which per MLA 302 (d) may contain additional or alternative maintenance instructions
xii) MLA 403 b) We suggest to clarify the meaning of "Required Equipment" by defining it as as "equipment required by any applicable regulation for each intended flight"
xiii) MLA 403 c) The current wording is quite strict as it would not allow the deferral of minor irrelevant defects beyond the time when a repair can be practically accomplished. We suggest to add the wording "Except for MLA403 b (1) and b(3) defects when deferred by authorized certifying staff as evidently not materially adversely affecting the function or performance of the aircraft or affected component, and unlikely to degrade to the point where it would materially affect the function or performance of the aircraft or affected component before the expiry date of the ARC"
xiv) MLA 501 d) The MLA 401 maintenance data now includes CS-STAN and therefore for completeness, this section should read "Material being either raw material or consumable material shall only be used on an aircraft or a component when so stated in the relevant maintenance data or as specified in Part-145." Thereby not limiting it to OEM data
xv) MLA 901 b) (4) Should include ELA2 as specified in iii) above
xvi) MLA 903 could include an item c) to facilitate transfer of ownership as follows "If the new owner chooses to declare a maintenance program per MLA302, he can continue to use the previous owner's declared maintenance program (if existing) within the validity of the existing ARC by inserting the corrected registration in the AMP and his dated signature next to that of the previous owner."
xvii) GM MLA 201 a) Is worded as if including the DAH ICA's were a requirement in the owner-declared maintenance program under part-NCO, this requirement should be eliminated and/or replaced with the minimum inspection program for compatibility with MLA302

Thx!

Antonio Cerezo

response

EXECUTIVE SUMMARY p. 1

comment *122* comment by: *Derek Grimshaw CPL(B)*

As a hot air balloon pilot for over 30 years, 25 of which has been as a commercial balloon pilot and as owner of 4 different balloons during that time I have found the British system for registering and maintaining Hot Air Balloons (up to 2009) to be safe, efficient, cost effective and delivered all the necessary checks that are required in maintaining a safe aircraft.

The current proposals from EASA for light aircraft go far beyond what is required and seems to be designed simply to add additional burdens on small operators.

The current sugestions made by the Britich Balloon & Airship Club are sensible, practical and cost effective and warrant serious consideration.

response

comment *491* comment by: *EFLEVA*

EFLEVA generally supports these proposals for further alleviations of the maintenance regime for light aircraft and believes that it should bring significant benefits and cost savings. However, there are some detailed issues where unnecessary restrictions still exist and we point out some of these in our later comments. We have some sympathy with the views expressed in Appendix II which sees Part M-L as a sticking plaster approach which increases regulatory complexity. See our comments on Appendix II

We have concerns about the impact the Part-ML regime may have on amateur-built experimental aircraft and others presently in Annex II. In particular, if Part-ML were to be transposed directly by some EASA states to apply to their national Annex II aircraft, or if these aircraft were brought into the EASA Part-ML regime by reason of changes to Annex II. There are several areas where the requirments of Part-ML are significantly greater than those for national Permit to fly regimes applied to Amateur-built aircraft. Hence we might find an increase in regulation, which would be unwelcome to many of our EFLEVA member associations.

response

comment *644* comment by: *AOPA Finland*

This Light Part-M is very welcome proposal after a decade of disproportionate, cost-burdening as well as highly complex if not impossible requirements towards lighter end of General Aviation community, including aircraft owners/operators, independent certifying staff, maintenance organisations, CAMOs and especially NAAs and CAAs overseeing these aircraft and activities. Unfortunately the era of this still continuing trend has almost tripled the operating and training cost of common GA aircraft from 84€/hr to 240€/hr, which has driven the annual flight time and hours to steep decline which could not be recovered anymore to steep rise.

response

2. Explanatory Note — 2.1. Overview of the issues to be addressed p. 5-6

comment *66* comment by: *Richard ALLEN*

2.1.1 As well as the increased cost burden reducing flight time per year, it can also make some pilots give up altogether, which is not good for the aviation industry as a whole. This has the effect of a reduction in GA pilots, and therefore fewer people to progress to the CAT environment.

response

comment *176* comment by: *Claude Lelaie*

It is unfortunate that the key issue for the approved maintenance organizations is not taken into account to ease their approval and keep it. A small organization with a couple of mechanics needs to have 2 manuals very similar: maintenance (M.A.601) and airworthiness (M.A.701) with 2 associated very long audits. These 2 manuals are necessary in a large company, but for sure not in a small maintenance entity. This complexity push some mechanics to refuse an agreement. If we want a maximun of entities to be approved, we need to simplify all what is possible. My proposal is to add paragraphs in this Part-ML to allow organizations of less than 20 people, to put the 2 manuals in the same document and that a single audit for maintenance and airwothiness be organized.

response

comment *335* comment by: *Howard Torode*

Comment from the European Gliding Union.

Objectives General: Creating a separate Part ML

The EGU supports the principle of a 'Part M Light'. However we remain critical of the scope of this current rulemaking activity, which has concentrated on combining the various approved functions to enable wider utility, without considering the basic structure of the various, highly costly approvals that form the basis of the EASA airworthiness system. What sport aviation, such as gliding, badly needs is a simple approval system which permits them the working freedom required to deliver these functions, with minimum bureaucratic overhead, to the satisfaction of our respective NAA's and members.

The wider freedoms, offered to both the individuals and the various involved organisations is welcomed, but the complex structure of functions and approvals still remains. Further, this legislation is heavily interlaced with other rules, such as Part 21 and Part 66, and inclusion even from Part 145. These really compromise the functionality of a so-called 'light' rule. The light sport sector, (particularly gliding and ballooning) continues to labour over a perceived complexity that is over elaborate for the needs of the light aviation that it is meant to serve.

response

comment *467* comment by: *Cary Crawley*

I would suggest that it could also be argued that if a relatively low number of regulated persons are inclined not to comply, this is not sufficient justification for a considerable relaxation of all appropriate regulations.

Furthermore, I fundamentally disagree with the apparent driving principle of using a desire to cut costs as a primary motivator to cut appropriate safety regulation.

In my view, there should be a proportionate balance between well constructed, well audited

	and well implemented saftey regulation and user related costs. All things have their price and that of "cheap aviation" should not in my opinion be a subsequent "cheapening of life" or lesser degree of public safety.
response	

comment	*468* comment by: *Cary Crawley* With regard to 2.1.3 I would request the statistical analysis evidence on which this statement is based and a further identification of the "risk" purported to have been identified.
response	

comment	*515* comment by: *Rogerio Pinheiro* *Dear Sirs,* *APTTA – Associação Portuguesa de Transporte e Trabalho Aéreo is pleased to submit its comments regarding NPA 2015-08.* *We welcome EASA initiative to address this issue. In fact, some smaller organizations are not capable to fully fulfil the current requirements for Part M and a simplified approach may contribute to a solution.* *Nevertheless, we stress that safety cannot be hindered by this solution. We fear that some of the items proposed by EASA may contribute to a more relaxed view of the operation and that cannot, by any chance, imply lesser guaranties regarding safety issues. We agree that some of the present requirements of Part M may not be applicable, however all requirements directly related with safety minimums should continue to be fully applicable.* *That is why we do not agree with the following EASA proposal "In the case of commercial operations where passengers may be involved, it is expected that these passengers are already aware that the level of safety provided by these aircraft (typically on leisure activities) cannot be identical to that of airline operators". We stress that these passengers are not (or may not be) from the aviation sector and such kind of statement will not be interpreted correctly. For the same reason we do not agree with EASA's proposal to mark the aircraft (with a placard, for example, as proposed in the NPA).* *We are confident that EASA will address this in an appropriate way.* *Kind regards,* *APTTA*
response	

2. Explanatory Note — 2.2. Objectives p. 6

comment	*9* comment by: *Da Ros Michele* I started my career in aviation in the technical office. I fastly became a technical office assistant, and then a CAMO office assistant. Now I'm the CAMO post holder. The problem is that this type of carreer avoided my to any training in the workshop: I'll never have a Part 66 Licence. The fact that Part 66 staff can "be" the CAMO of GA aircraft because

they are "simple aircraft" it's a great mistake.
After years spent in General Aviation aircraft Part 145 and Part M/F workshop, I can tell you that these aircrafts are like flying bullets. WITH a CAMO checking, the works are accomplished in a certain manner, and a lot of things, works and modifications are hiddened to the CAMO office and P.H. The CAMO discovers them during the ARC renewal. WITHOUT this check, it will be anarchy.
My experience with G-registred and D-registred aircraft, with German Prüfers and English Officers signing with they're HUGE Part 66 Licence, holding also a Part G+I certificate, making them "gods", tells me that what you are doing is simply applying this schema to the entire EU / EASA aircraft fleet.
The de-registration of GA aircraft to the N register won't change with this regulation, with this new ML. The minimum inspection program sadly reminds me the CAA LAMP, that is stupid and non sense: a Mooney Ovation M20R and a Piper J3 in UK have the same program, the LAMP and are completely different aircraft.
What you shall do, is the evenness of the rules between each country in the EASA zone. I mean: I can't change registration from F- to D- because I have to accomplish with French "Fascicules" where I have the hoses to be replaced every 10 years or because in Germany I have a grace period on engine and propeller TBO (10%, I don't remember). Pitot-static system check, avionic tests, weight&balance must be the same for all EASA countries. EASA SIB and EASA information letters must replace national NfL, Circolari, Fascicule and so on.
If you start to erase the CAMO importance from GA aircraft, then ATOs will ask you for doing that for them too! Then turbine aircraft, then commercial aircraft and so on.
Do not think that GA aircraft are less dangerous than large aircraft, they aren't and my experience makes me sure of it.

response

comment *261* comment by: *UK CAA*

Page No: 6 and 7

Paragraph No: *2.2.* Objectives; and 2.3.1. Description of the 'Developing a Light Part-M' option

Comment: The objectives of the working group and of the proposed changes are set out in Section 2, Explanatory Note. The objectives used the words, 'simpler', 'clearer' and 'more proportional rules', and 'as clear and simple as possible' in order to facilitate implementation. There is also an, objective to separate 'Light Part-M' (Part-ML), and make it independent from Part-M.

Utilising the text from Part M, and in an attempt to minimise the size of the proposed Part ML, has created the situation where the wording used in some areas does not make the proposal easy to follow and therefore has the potential to lead to confusion or lack of understanding on the part of the reader.

If the text cannot be understood quickly and easily by members of the general aviation community then the intention of the proposal will be compromised, and with it the presumption that the new regulation will increase in the level of safety.

Examples include: ML.A.201 (c) and (d), where the terms "not operated under Part-NCO

rules" and "operated under Part-NCO rules" are used. For the average GA pilot/owner these two statements in the context will prove difficult to interpret and understand. This will need to be expanded into a much larger statement to enable the reader to understand the detail.

Justification: The proposal should be as simple and clear a possible in order to meet its stated objectives

response

comment *303* comment by: *The Norwegian Air Sports Federation*

NLF appreciates the co-ordination efforts between this rulemaking tasks and other airworthiness-related activities, such as Part-M Phase I, CS-STAN, B2L and L Part-66 aircraft maintenance licenses", etc. Multiple rulemaking tasks addressing similar and/or related issues for the prupose of improving GA regulation causes some confusion in the market as to which regulation is applicable at any given time. However, NLF strongly believes that fixing problems with the current regulation quickly is so important that it more than compensates for the disadvantage linked to a "jungle" of continuously changing rules related to airworthiness.

In going forward, NLF would like the Agency to continue the same approach, with one exception: Start publishing consolidated regulations as soon as new regulations are being finalised. If the market (including recreational pilots) is expected to adopt the regulation within a certain deadline, surely the authorities must be able to publish a consolidated package of rules in time.

response

comment *336* comment by: *Howard Torode*

Comment from the European Gliding Union

Explanatory note 2.2: Creating a separate Part M Light

The EGU supports the principle of a 'Part M 'Light'. However we remain critical of the scope of the current rulemaking activity, which has concentrated on combining the various approved functions to enable wider utility, but without considering the basic structure of the various highly costly approvals that form the basis of the EASA airworthiness system. In sport aviation such as gliding we badly need a simple approval system which permits us the working freedoms required to deliver these functions, with minimum regilatory overhead, to the satisfaction of our respective NAA's and to the benefit of our members.

The wider freedoms offered to both individuals and the various involved orrganisations are welcomed, but the complex structure of functions and approvals still remains. Further, this legislation is heavily interlaced with othher rules, such as Part 21, Part M (itself), Part 66, and inclusions even from Part 145. These really compromise the utility of a so-called 'Light' rule. The light sport aviation sector, (particularly gliding and ballooning) continues to labour over perceived complexity that is over elaborate for the needs of the light aviation community that it is meant to serve.

response

comment	*376* comment by: *BGA* **Segment description 2.2 Objectives Page 6** *Objectives General: Creating a separate Part ML* The BGA supports the principle of a Part ML. However we remain critical of the scope of this current rule making activity, which appear to have concentrated on combining the various approved functions to enable wider utility, without considering the basic structure of the various, highly costly approvals that form the basis of the EASA airworthiness system. What sport aviation, such as gliding, badly needs is a simple approval system to allows us the working freedom we require to deliver these functions, with minimum bureaucratic overhead, to the satisfaction of our respective NAA's and members. While Part ML is a step in the right direction, as currently formulated it is difficult to assess its likely impact. The wider freedoms to both the individuals and the various involved organisations is welcomed, but the complex structure of functions and approvals still remains. Further, this legislation is heavily interactive with other rules (such as Part 21 and Part 66) that further complicate the functionality. This sector continues to labour over a perceived complexity that is over elaborate for the needs of the light aviation that it is meant to serve.
response	

comment	*450* comment by: *René Meier, Europe Air Sports* 2.2. Objectives Page 6 Second sentence Question: What “further alleviations to those proposed during Phase I have been proposed?" How can the readers easily identify these proposals?
response	

comment	*680* comment by: *René Meier, Europe Air Sports* 2.3.1 Description of the …”Light Part-M” option Page 7 2. making Part-ML applicable to ELA2 aircraft + Many thanks for this. We really welcome this new situation. Our question: What does the Agency mean by “including all types of operations”? Rationale: This needs to be clarified, the sentence as published leaves too much room for interpretations.
response	

2. Explanatory Note — 2.3. Regulatory Impact Assessment (RIA) — 2.3.1. Description of the'Developing a Light Part-M'option p. 7

comment *24* comment by: *BBAC British Balloon and Airship Club (UK)*

1. creating a separate 'Light Part-M' (Part-ML), independent from Part-M, which is as clear and simple as possible;

BBAC: We prefer all ballooning regulation under a separate "Part Balloons", written from the start for ballooning needs. Part ML is a second best option, since it still represents aircraft regulation diluted and somewhat simplified, but applied to balloons.

response

comment *25* comment by: *BBAC British Balloon and Airship Club (UK)*

2. making Part-ML applicable to ELA2 aircraft and helicopters certified for up to 4 occupants and up to 1 200 kg Maximum Take-Off Mass (MTOM), including all types of operations;

BBAC: We support Part ML for ELA2 aircraft, in order that all hot air and gas balloons and simple hot air and gas airships are covered, irrespective of the purpose for which they are flown

response

comment *26* comment by: *BBAC British Balloon and Airship Club (UK)*

3. including the possibility of declaration of the maintenance programme by the owner for all aircraft in the scope of Part-ML;

BBAC: we support this as a principle for light General Aviation, though we do not believe balloons need a specific MP since they are such simple aircraft and the MP for balloons does nothing other than call up the DAH's maintenance manual.

response

comment *27* comment by: *BBAC British Balloon and Airship Club (UK)*

4. including the possibility of using Minimum Inspection Programmes instead of the data from the Design Approval Holder (DAH), for all aircraft in the scope of Part-ML;

BBAC: we support this as a principle for light General Aviation, however we see no application in, or particular benefit to, ballooning. The MIPs from the DAHs are in all cases completely satisfactory for ballooning.

response

comment *28* comment by: *BBAC British Balloon and Airship Club (UK)*

	5. developing a very simple template for the maintenance programme, applicable to all aircraft in the scope of Part-ML; BBAC: we support this as a principle for light General Aviation, though we do not believe balloons need a specific MP since they are such simple aircraft and the MP for balloons does nothing other than call up the DAH's maintenance manual.
response	

comment	*29* comment by: *BBAC British Balloon and Airship Club (UK)* 6. allowing approved maintenance organisations to perform airworthiness reviews and issue ARCs in conjunction with the 100 h/annual inspection, for all aircraft in the scope of Part-ML; BBAC: we support this as a principle for light General Aviation, though we submit that the ARC should not be a requirement for balloons (see elsewhere in this CRT response for details)
response	

comment	*30* comment by: *BBAC British Balloon and Airship Club (UK)* 7. allowing independent certifying staff to perform airworthiness reviews and issue ARCs in conjunction with the 100 h/annual inspection, for sailplanes, balloons, hot-air airships and ELA1 aeroplanes operated under the Part-NCO rules; BBAC: we support this as a principle for light General Aviation, though we submit that the ARC should not be a requirement for balloons (see elsewhere in this CRT response for details). We note that a clear objective under part OPS (better, under a Part Balloons) is that all ballooning is under Part-NCO, or at least that no ballooning is under Part-CAT.
response	

comment	*31* comment by: *BBAC British Balloon and Airship Club (UK)* 8. increasing the cases where the pilot can defer defects without the intervention of certifying staff, for all aircraft in the scope of Part-ML which are operated under the Part-NCO rules; and BBAC: we support this as a principle for light General Aviation
response	

comment	*32* comment by: *BBAC British Balloon and Airship Club (UK)* 9. providing guidance for the extension of TBO intervals and for the deviation from other DAH's recommendations. BBAC: we support this as a principle for light General Aviation

response	

comment	*56* comment by: *Kevin Meehan* Whilst PART ML is a good step forward in making it simpler for balloon maintenance, but it does not address that fact that the majority of PART ML is derived from the regulations for aircraft maintenance in PART M which are not applicable to balloon maintenance. Balloon maintenance would be much better organised and regulated under a PART BALLOONS system.
response	

comment	*57* comment by: *BUHABS (Bristol University Hot Air Ballooning Society, UK)* We support Part ML as a small improvement for balloons compared to Part M. However it is still much too complex, with aircraft type rules inappropriately applied to balloons. It would be better to start again with regulation specifically for balloons. The same is true for licensing and operations. We understand from EBF that they propose a "Part Balloons" and we support this.
response	

comment	*65* comment by: *Richard ALLEN* 2.3.1 (1) - Part ML is a significant improvement when compared to Part M, but it is still too complicated for balloons, which are much simpler aircraft than fixed wing aircraft. A separate ruleset, e.g. "Part Balloons", containing everything pertinent to balloons would be better, with this still being "light".
response	

comment	*74* comment by: *Richard Nash* For balloons, Part-ML is a significant improvement compared to Part-M but still appears to be excessive for such simple aircraft. Surely it would be more appropriate to have a separate set of rules for balloons?
response	

comment	*85* comment by: *Preece* This is all too complicated, I as a ballooist simply do not understand it, and I don't see why I should. It seems that the mountain of rules suitable for passenger jets has been applied to all aircraft, even the very simplest, where there is no relevence at all. It would be far better to have a short and simple collection of relevent rules for the simpler aircraft - eg balloon, microlights, etc. Keep all those rules in one place "a booklet", and keep it "light". Simplicity, necessity and relevence should be your masters. While at it, avoid Americanisms, the USA should be safely ignored, can we English in English please. Plain English that we can understand. Same to apply for all the other translations.

response

comment *90* comment by: *Medical Officer BBAC*

Refer to: 2.3.1. Description of the 'Developing a Light Part-M'option, item 1. Creating a separate 'Light Part-M' (Part-ML), independent from Part-M, which is as clear and simple as possible;
Part-ML remains far too complex for balloons. Balloons are of a very simple construction such that one can manufacture such in one's own living room. UK balloons have had no accident or incident over the last 35 years due to a mainteancne issue and so ther is no need to increase bureaucracy for no improved outcome.

response

comment *96* comment by: *Phil Dunnington*

2.3.1 - 1 This should be subsumed into an all-encompassing document entitled "Part BALLOONS"
- 2 All balloons should be included regardless of capacity or operational purpose.
- 3 An MP separate from that provided by the aircraft manufacturer is not necessary for balloons.
-6/7 An ARC is an unnecessary instrument for balloons and adds nothing to safety, only cost and complexity.Balloons are rarely transferred between NAAs so the ARC offers no bureaucratic advantages.
-7/8 These features should apply to all balloons regardless of operational use and should be grouped under "Part BALLOONS"

response

comment *106* comment by: *Pilot Niels Hvid*

Part ML, enven though it lightens the burdens, is stay too complex. Rules from commercail aviation are applied to hobby balloonist, many of whom do not need that. Denmark has an excellent track record with much simpler rules within ballooning. You would recommend a general GA plan and then allowance to make local versions with are extremely light, as balloons in no way are as complex as A380 or even pleasure planes.

response

comment *117* comment by: *andrew laing*

it still seems overly complicated and basically is trying to include balloons within aircraft rules - they are so different balloons really need a seperate rule book

response

comment *123* comment by: *Andrew DAVIDSON*

I support the proposal fot part ML but feel it is too complex and does not acknowledge the

	that balloons are mechanically very different from other aircraft. It would make more sense to have a separate subset of rules for balloons.
response	

comment	*124* comment by: *Andrew DAVIDSON* I support the proposal for Light Part-M but feel it is still far to complicated. Balloons are mechanically very different from other aircraft and it would be better to develop a subset of rules for free balloons.
response	

comment	*129* comment by: *Richard Gyselynck* 2.3.1 item 1 - With rules designed for aircraft still being applied to balloons, ML is not really a fully appropriate simplification, but is as step ahead of Part M. Instead, it would be better to develop a Part Balloons dedicated solely to balloons, as their requirements are utterly unlike those of any other aircraft. This shoud be appropriate and 'light'
response	

comment	*135* comment by: *Carillion* **balloons should be treated as an entirely seperate catagory, they are not the same as fixed wing or powered aircraft. exemptions become confusing. Britains Red Tape Challenge is to reduce complication, make legislation, intsructions, safe systems of work understandable and in "plain english". if we are to change something, it needs to be changed suitably and only as is needed to make it sufficient and fit for purpose. lets not have to revisit this again later because it isnt working!**
response	

comment	*140* comment by: *Derek Maltby* I support the adoption of Part ML but Part M is much too complex and should not be applied to balloons; only fixed wing aircraft. I am of the opinion that there should be separate rules for balloons and lighter than air, craft. The rules applicable to balloons no not add to the safty of these craft and are frewuently flouted for that reason. Something whihc is more appropriate and written specifically for balloons is likely to be adhered to.
response	

comment	*170* comment by: *Merlin Balloons* "Light Part-M" is still applying aircraft rules to balloons. Separate rules for balloons only would be far more appropriate, so all the rules to do with balloons are in one place!
response	

comment	*204* comment by: *Allie Dunnington* page 7. 2.3. As an inspector trainee for hot air balloons, I believe that adopting Part ML is a good way forward but the rules and regulations are still far too complex for the simple flying machine that balloons are. There are still too many 'big' rules that might be reasonable and sensible for airliners but make no sense for hot air balloons. I would therefore strongly recommend a new 'set of rules' specifically for balloons. 2.3.1 Part ML should indeed be set up to cover all hot air and gas balloons whether flown commercially or privately. It should also include hot air airships and hoppers (single seater balloons).
response	

comment	*206* comment by: *Allie Dunnington* 2.3. my answer hereto is similar to what I mentioned in my previous comment: whilst in general the idea is supported, it is not really necessary for hot air balloons as the DAHs already provide sufficient and comprehensive data. 2.3.1. Again for the same reason: MPs do not provide any additional value for the safe maintenance of balloons and therefore should not be neccessary at all. 2.3.1 ARCs: airworthiness reviews and the requirement to issue them are probably the single most useless addition of bureaucracy that had been added to ballooning over the past years. They do not have any meaning and add nothing to the overall inspection and airworthiness to the balloon. ARCs should definitely abolished. Balloons should come under one regime -NCO - or 'Part Balloons'.
response	

comment	*224* comment by: *CAA-NL* **EN: 2.3.1 item 3 t/m 5 applicability for CAT** 3. including the possibility of declaration of the maintenance programme by the owner for all aircraft in the scope of Part-ML; 4. including the possibility of using Minimum Inspection Programmes instead of the data from the Design Approval Holder (DAH), for all aircraft in the scope of Part-ML; 5. developing a very simple template for the maintenance programme, applicable to all aircraft in the scope of Part-ML; In line with the general comment made above, we would only accept this if the passenger will be informed of the situation at the time of purchase of the ticket, when the operator uses the alleviations possible with Part ML. Although we wonder if the unknowledgeable passenger who is buying a ticket is able to grasp the possible consequences of that information on his risk profile.

response

comment *262* comment by: *UK CAA*

Page No: 7

Paragraph No: 2.3.1 Description of the 'Developing a Light Part-M' option, sub-paragraph 1

Comment: In paragraph 2.3.1 sub-paragraph 1, it is stated that the objectives of the task could be met by creating a separate 'Light Part-M' (Part-ML), independent from Part-M, which is as clear and simple as possible;

Throughout the new, proposed Annex VI, there are numerous links, inferred connections back to the existing Part M regulation and parts of the text are repeated from Part M. The objective to significantly lower the complexity of the regulation and achieve a separate, independent Part M Light has not been fully achieved with the proposal in its current form.

Examples are:

- the new Form 15c mixes Part M and Part ML;
- for the same class of aircraft ML.A.302 (d) (1) is in contradiction with M.A.302 (i) for calculating the next inspection time after the tolerance is applied;
- ML.A. 902, 903 and 905 have been repeated from Part M.

It is suggested that Part M and the proposed Part ML are completely separated to enable a reduction in the text within Part M through the removal of the derogations and alleviations that has complicated the text for the reader. It will also enable changes made to one regulation not to affect the other.

Justification: To implement the changes demanded by the General Aviation community that are captured in the NPA in paragraph 2.1 of the Explanatory Note.

Proposed Text: Produce a completely separate Part M and Part M-Light regulations.

response

comment *286* comment by: *Jos TREHERN*

Re: 2.3.1. Description of the 'Developing a Light Part-M' option, item 1

Creating a separate Part ML compared to Part-M is supported, however applying aircraft rules to balloons is still much too complex. It is recommended that all things related to balloons be placed entirely in a separate and appropriately "light" rulebook for balloons ("Part Balloons").

response

comment	*287* comment by: *Jos TREHERN* **Re: 2.3.1. Description of the 'Developing a Light Part-M' option, item 2** Part ML should be applicable to all hot air balloons, simple hot air airships, gas balloons and simple gas airships, whether used for private or other uses.
response	

comment	*288* comment by: *Jos TREHERN* **Re: 2.3.1. Description of the 'Developing a Light Part-M' option, item 3** This is supported in principle, but since all balloon manufacturers provide sufficient information in their manuals, maintenance programmes are not needed for balloons.
response	

comment	*295* comment by: *Jos TREHERN* **Re: 2.3.1. Description of the 'Developing a Light Part-M' option, item 4** This is supported in principle, but for ballooning the manufacturers (DAHs) provide entirely adequate and satisfactory data.
response	

comment	*297* comment by: *Jos TREHERN* **Re: 2.3.1. Description of the 'Developing a Light Part-M' option, item 5** This is supported in principle, but the use of maintenance programmes for balloons is not adding any value.
response	

comment	*298* comment by: *Jos TREHERN* **Re: 2.3.1. Description of the 'Developing a Light Part-M' option, item 6** This is supported in principle, but the requirement for ARCs should be removed for balloons as they have no safety value, whilst adding costs and bureaucracy.
response	

comment	*299* comment by: *Jos TREHERN* **Re: 2.3.1. Description of the 'Developing a Light Part-M' option, item 7** This is supported in principle, but ARCs should be removed for balloons. In addition, all

	ballooning should come under one regime, either NCO, or preferably, “Part Balloons”.
response	

comment	*304* comment by: *The Norwegian Air Sports Federation* 2.3.1 NLF strongly supports the alleviation principles in this paragraph. However, we have an issue with item (7): Why limit this provision to sailplanes, balloons, hot-air airships and ELA-1 aircraft? As long as the aircraft is operated under Part-NCO rules, also ELA-2 aircraft should be included in this provision. We would like to remind the Agency about the risk hierarchy put forward in the EASA Roadmap for Regulation on General Aviation: **"Risk hierarchy** 1. Uninvolved third parties 2. Fare-paying passengers in commercial air transport (CAT) 3. Involved third parties (e.g. air show spectators, airport ground workers) 4. Aerial work participants / Air crew involved in aviation as workers 5. Passengers (“participants”) on non-commercial flights 6. Private pilots on non-commercial flights Principle 2: All regulation should be screened against the backdrop of the above risk hierarchy and resulting need for protection. " Airworthiness concerns to both ELA-1 and ELA-2 aircraft (operated under Part-NCO) will affect the identical levels in the risk hierarchy, i.e. level 5 and 6 (passengers and privat pilots on non-commercial flights). For uninvoled third parties the difference between ELA-2 aircraft and the other cateogories actually included in the provision is negligible. This is not only NLF's position: The Agency says it clearly in this very NPA (page 8): "The consequences on uninvolved third parties of an accident of an ELA2 aircraft larger than ELA1 are not expected to be much different from those stemming from an accident of an ELA1 aircraft. Similar conclusions can be reached for an accident involving helicopters certified for up to 4 occupants and up to 1 200 kg MTOM."
response	

comment	*364* comment by: *Cameron Balloons Ltd* Part ML is a step in the right direction, but it still applies the very complex rules set for fixed wing aircraft to the simplest form of flying, hot air balloons. There needs to be an even more simplified version that is appropriate to the type of aircraft. All balloons, hot air, gas and hot air airships should all be covered by one simple set of regulations.
response	

comment	*373* comment by: *European Balloon Federation* ref 2.3.1

Whilst the creation of part M-L is welcomed, as an attempt to alleviate some of the worst excesses of part M, it is not the best solution to the problem of part M since it still follows part M and the part M methodology of satisfying the Basic regulation.

A preferable solution for our sector would be a separate part-Balloons (and part-Sailplanes), which can ignore all the existing implementing rules applicable to heavier aviation and start from scratch with properly proportionate rules which implement the Basic Regulation (which also needs to change to allow more proportionality).

response

comment *374* comment by: *Cameron Balloons Ltd*

A simple maintenance programme should be applied to all aircraft that come under the part ML, using the manufactueres inspection schedules is satisfactory simple aircraft.

During the 100 hour/ annual inspection the aircraft is released back to service using the CRS system, to simplyfy matters the ARC, airworthiness review and the CRS should be a single document.

Hot air balloons are also very simple aircraft, they should be under a specific regulation or sub-partn regulation that deals only with balloons and not grouped in with other ELA1 Aeroplanes.

response

comment *391* comment by: *European Balloon Federation*

re 2.3.1, 2:
EBF welcomes the inclusion of ELA2 aircraft, for all types of operations – recognition that, for aircraft such as balloons, the maintenance requirements are the same, irrespective of size or type of operations.

response

comment *392* comment by: *European Balloon Federation*

re 2.3.1, clause 3:
EBF welcomes this simplification to the approval process for the MP – although we still contend that a separate stand-alone MP is superfluous when the manufacturer/design holders documentation contains everything which would be contained in an MP (as is the case with balloons).

response

comment *393* comment by: *European Balloon Federation*

re 2.3.1, clause 4:
EBF welcomes this alleviation as a principle, although cannot see any practical benefit for ballooning, where currently the manufacturers/design holders information is comprehensive

	and entirely satisfactory.
response	

comment	*394* comment by: *European Balloon Federation* re 2.3.1, clause 5: EBF welcomes this proposal, particularly its extension from the previous proposals to now include all balloons for all types of operations. This will help eliminate past difficulties with differences of interpretation over requirements between NAAs. However, this simplification again serves to highlight the fact that all the same information is contained within the manufacturers/design holders documentation and, as such, a separate MP is superfluous.
response	

comment	*395* comment by: *European Balloon Federation* re 2.3.1, clause 6: EBF welcomes this proposal – although we consider that the ARC itself should not be a requirement for balloons (see other comments)
response	

comment	*396* comment by: *European Balloon Federation* re 2.3.1 clause 7: EBF welcomes this proposal – although we consider that the ARC itself should not be a requirement for balloons (see other comments).
response	

comment	*397* comment by: *European Balloon Federation* re 2.3.1, clause 8: EBF welcomes this proposal
response	

comment	*402* comment by: *Swedish Transport Agency* **1.** creating a separate 'Light Part-M' (Part-ML), independent from Part-M, which is as clear and simple as possible; ***Comment:*** • *STA has no objection of the creation of the Part-ML.* ***2.*** making Part-ML applicable to ELA2 aircraft and helicopters certified for up to 4 occupants and up to 1 200 kg Maximum Take-Off Mass (MTOM), including all types of operations; ***Comment:*** • *STA only support Part-ML for aircraft **not** used by licenced air carriers in accordance*

with Regulation (EC) No 1008/2008. Passengers and pilots expect certain level of safety for this type of operation.
- *STA don't have any objections to extend the applicability to ELA2 and helicopters.*

3. including the possibility of declaration of the maintenance programme by the owner for all aircraft in the scope of Part-ML;

Comment:
- *STA only support Part-ML for aircraft **not** used by licenced air carriers in accordance with Regulation (EC) No 1008/2008.*
- *There may be consequences if the owner alone has the possibility to decide if recommended maintenance task with flight safety issues (but not mandatory) can be disregarded without justifications and then has the possibility to declare the AMP. For example:*
  - *Cessna SID/CAP inspections (some NDT inspections to detect fatigue).*
  - *TBO on engines and propellers.*
- *STA propose that all deviation must be justified (documented in the AMP) for aircraft used by SPO and ATO operators.*
  - *For all deviations, a safety risk assessment shall be performed by the owner and documented to justify the deviations.*
    - *The deviation should also be accepted by the operator CAMO.*
    - *Otherwise the owner´s economical interest may have a major impact.*

4. including the possibility of using Minimum Inspection Programmes instead of the data from the Design Approval Holder (DAH), for all aircraft in the scope of Part-ML;

Comment:
- *See comment on item 3 above.*

5. developing a very simple template for the maintenance programme, applicable to all aircraft in the scope of Part-ML;

Comment:
- *The template has been simplified so much that it may be beyond understanding for persons with less knowledge of Part-M/ML and maintenance programs. Keep in mind that the target group is persons with less knowledge of Part-M/ML.*
- *STA propose to revert to the template in CRD to NPA 2012-17 or make a detailed GM with completion instructions, "How to complete the AMP".*

6. allowing approved maintenance organisations to perform airworthiness reviews and issue ARCs in conjunction with the 100 h/annual inspection, for all aircraft in the scope of Part-ML;

Comment:
- *STA has no objection on this proposal to extend the scope for AMO's to perform the airworthiness reviews.*

7. allowing independent certifying staff to perform airworthiness reviews and issue ARCs in conjunction with the 100 h/annual inspection, for sailplanes, balloons, hot-air airships and

ELA1 aeroplanes operated under the Part-NCO rules;

Comment:

- *STA have concerns on this proposal.*
  - *If the privilege of the independent staff without authorization is extended, what kind of action can NAA perform to remove the privilege? Maybe a change in 66.B.500 is necessary.*
  - *The current M.A.901(g) will have less privilege. (ELA1 and recommendation). Will this possibility be removed if the independent staff received extended privileges?*
- *STA instead propose the following:*
  - *The independent Certifying Staff shall be authorized acc to M.A.901(g). One reason is to have some control/track of the personnel that perform the airworthiness review. (Verification of knowledge, send information, revoke, suspend the authorization if necessary).*
    - *The authorization should include the issue of the ARC.*
  - *In addition STA propose to extend M.A.901(g) to include ELA2 aircraft and helicopters certified for up to 4 occupants and up to 1 200 kg MTOM for aircraft operated under the Part-NCO rules.*

8. increasing the cases where the pilot can defer defects without the intervention of certifying staff, for all aircraft in the scope of Part-ML which are operated under the Part-NCO rules; and

Comment:

- *STA has no objection about the principle of the proposal.*

9. providing guidance for the extension of TBO intervals and for the deviation from other DAH's recommendations.

Comment:

- *The proposed guidance may be a tool that can contribute to more fair treatment of deviations from the DAHD recommendations.*

response

comment *431* comment by: *Ossi KORHONEN*

As an owner of C180 seaplane I propose not to limit PART ML to 1200kg. Especially for seaplanes, it is very heavy operate under PART M. Nowadays there exists only one ramp in the country to take the plane with straight floats from the water to maintenance/repair station. The C180 is very simple plane with manual flaps and the carburetor engine has no fuel pump. The seating is for 4 persons and use privat. If the proposed 1200kg limit will stay, I propose updating the EASA ANNEX II aircraft list to include C180. This list in its present content may not be meant to stay forever. This plane is 48 year old and the type has not been produced during several decades. As final comment I see that EASA should ease the maintenance of all non complex aircraft as an equal treatment principle.

response

comment *437* comment by: *The Finnish Aeronautical Association*

	Comment to point 7. allowing independent certifying staff to perform airworthiness reviews... : While the Finnish Aeronautical Association fully supports this, we feel that the wording could be improved. The first priority is the relaxation of this rule as it is underway and second priority is to extend this rule to ELA2 aircraft. This principle is in line with the text but wording could be improved so as to avoid misinterpretation. We don't want that inclusion of ELA2 is used as a pretext to make more onerous rulings than proposed, but also urge EASA to recognise that many ELA2 airplanes are of very simple build and not in any way more difficult to maintain than ELA1 aircraft.
response	

comment	*440* comment by: *flyingadverts* Part ML is still far too complex, it is light aircraft rules applied to balloons and it would be better for there to be a separate reguations for balloons entirely proportional and appropriate LIGHT
response	

comment	*442* comment by: *flyingadverts* MPs are totally not needed for balloons as manufacturers provide complete information in their manuals
response	

comment	*443* comment by: *flyingadverts* Item 4 ballooning manufacturers DAHs already provide completely sufficient and satisfactory data
response	

comment	*444* comment by: *flyingadverts* item 5 MPs have no value in hot air balloon maintainence or operaton or safety
response	

comment	*445* comment by: *flyingadverts* item 6 ARCs have no use for balloons and should be abolished

response

comment *454* comment by: *Chris Davies*

Refer to: 2.3.1. Description of the 'Developing a Light Part‑M' option, item 1 . Creating a separate 'Light Part‑M' (Part‑ML), independent from Part‑M, which is as clear and simple as possible;
A "light" version of part M is a small step in the correct direction but ballooons are closer to submarines in concept and operation than any other aircraft therfore should have rules that address the simplicity of balloons. I suggest inspections at 2 year 100 hour intervals.

response

comment *469* comment by: *Cary Crawley*

With regard to 2.3.1 part 7- I would request further definition of the phrase "independent certifying staff".

response

comment *470* comment by: *Cary Crawley*

With regard to 2.3.1 part 8. In practice, defects often go unreported until it is "convenient" for the operator or pilot to attend to or report them.

In my opinion, we need a workable rule which is seen to be audited by the regulator in conjunction with a greater degree of understanding of the genuine practical safety risks associated with poor compliance. This could be interpreted as a requirement for a higher level of pilot maintenance education in order to inform appropriate and safe deferment decisions.

response

comment *476* comment by: *René Meier, Europe Air Sports*

Page 7
3. including the possibility…
Question:
Are "individual aircraft maintenance programmes" and "generic maintenance programmes" within this scope?

Rationale: This needs to be clarified, the sentence as published leaves too much room for interpretations.

response

comment *478* comment by: *René Meier, Europe Air Sports*

Page 7

	5. developing a very simple template Remark: What "very simple" means depends on the precise definition of the term and of course, on the author of the term. Rationale: Definitions have to be appropriate to the classes of aircraft and to the types of operations. CAT definitions would not fit for sports and recreational activities undertaken with non-complex motor-powered aircraft.
response	

comment	*480* comment by: *René Meier, Europe Air Sports* Page 7 9. providing guidance for the extension of TBO intervals Remark: Please do more than just "provide guidance": Insist on the fact that any recommendation is a recommendation, never hard law Rationale: We do want clear rules, no national variants. It is the owner/operator who best is in position to evaluate the operational risk linked to any deviations of the type certificate holders' maintenance recommendations.
response	

comment	*492* comment by: *EFLEVA* EFLEVA agrees with the analysis in the consultation regarding safety. In our view ELA1 and ELA2 aircraft should display a standard placard in the cockpit with a passenger warning. The placard should indicate in language understandable to a non-pilot, that the aircraft is maintained according to a Light Aircraft programme requiring a lower standard of scrutiny than is necessary for commercial air transport in larger aircraft.
response	

comment	*538* comment by: *Colin Wolstenholme* Part ML is better, but still overly complex and complicated for balloons. It still seems to apply aeroplane rules to balloons. An appropriate course of action would seem to be a separate 'Part' or rule book for balloons that could cover everything related to balloons and not try to treat them as aircraft.
response	

comment	*541* comment by: *Colin Wolstenholme* Ref 2.3.1 item 2 Why not cover all hot air balloons and gas balloons and airshops wheter private or non

	private with this Part ML?
response	

comment	*543* comment by: *Colin Wolstenholme* ref 2.3.1 item 3...maintenance programme The idea seems sensible in principle, but as balloon manufacturers provide all the information in their flight manuals it does not seem necessary or helpful to have an additional (maintenance programme) manual
response	

comment	*545* comment by: *Colin Wolstenholme* ref 2.3.1 item 4 again it makes snese, but balloon manufactureres - what you refer to as a DAH already provide what is requiored.
response	

comment	*548* comment by: *Colin Wolstenholme* ref 2.3.1 item5 - template a maintenance programme or template does not add any safety value for balloons, althought the idea is supported in pronciple.
response	

comment	*552* comment by: *Colin Wolstenholme* ref 2.3.1 item 6 approved manintenace organisations and ARCS ARCs are not necessry to increase the safety of ballooning and should be completely removed for all balloons
response	

comment	*558* comment by: *Colin Wolstenholme* ref 2.3.1 item 7..independent certifying staff... As before, there may be a benefit for ARC elsewhere in aviation, but should be completely removed for balloons. All ballooning shoudl be under one national organisation, or a separate 'Part Balloons'
response	

comment *592* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

2.3.1 Description of the "Developing a Light Part-M" Option

2. Commercial Air Transport should not be affected by the Part ML alleviations.

3. We have some doubts that the possibility of a self-declaration is a really constructive alleviation. The owner must have a quite distinct knowledge to make the relevant decisions and create a suitable maintenance programme. Also the “do nothing approach” regarding the needlessness of justification of TBO deviations by the declaring owner is undesirable. As the system of self-declaration is already introduced with EC Regulation 2015/1088 and will obviously not be changed whilst introduced/proposed for ELA2 in this NPA, there remains the possibility to change the proposed acceptable means of compliance and guidance material for Part ML.
AMC MLA.302(c) and GM ML.A.302 of the proposed NPA state that the owner does not have to justify any deviations from the DAH’s recommendations (TBO).
This guidance material gives the owner boundless possibilities. An engine could theoretically remain in service legally for 50 years without overhaul, while the DAH recommends a TBO of 12 years.
On the other hand EASA makes the owner fully responsible for his actions. Obviously this has been adopted from the US/FAA-System. We argue that the legal (responsibilities) consequences of an accident will not be the same within the US legal system as compared with a European country. Therefore the “do nothing approach” does not appear as a really solid solution.
FOCA highly recommends to oblige the declaring owner to use the same tools and guidelines as foreseen by AMC ML.A.302(c) for the maintenance programme approving authorities and CAMO’s. The risk based approach using the table of criteria also provides the owner with a reliable guideline regarding the specific amount of TBO interval extension. Following these criteria the penal and civil reliability consequences for the declaring owner in case of an accident will be essentially different than if following the “do nothing approach”.

We have supporting evidence to prove, that the “do nothing approach” regarding engine TBO extensions have provoked technical conditions that have led to no-airworthy engines/aircraft. As you may know, FOCA already established a comparable procedure to evaluate TBO deviations. Following this procedure the owner has to conduct a special inspection on the engine, before AMP’s, deviating from DAH’s recommendations (TBO extensions), will be accepted. After the inspection several engines were withdrawn from service due to various causes (e.g. corrosion) instead of a TBO extension. FOCA therefore created a list of engines (including further information) that were withdrawn from service, due that special inspection. If the special inspection had not been carried out we assume these engines would have remained in service and problems would have occurred sooner or later. The problem is, that without special inspection the majority of wear outs cannot be detected.
Following a “do nothing approach” these engines would have remained in service.
Therefore we are convinced that an absolute maximum TBO extension rate has to be foreseen by the AMC. Even more important would be, that every owner has to use the guidelines provided by the AMC ML.A.302(c) before deviating from DAH’s recommendations and declare his AMP accordingly.

A list of engines withdrawn from service is annexed to this comment 534 (Annex 2).

7. The independent certifying staff should demonstrate relevant knowledge as is demanded from an ARC staff of a CAMO and should also be accepted as ARC staff by the competent authority. The requirements for all ARC staff should be the same.

9. The essential tool regarding TBO interval extension is now given by AMC ML.A.302(c). On a risk based approach the table provides the aspects to be considered to evaluate deviations from the DAH's recommendations and is highly welcomed.
Nevertheless the table should provide more key data regarding the appropriate result/evaluation of criteria. The organisation/person using this table should obtain a useful result, after assessing the relevant parameters. Concretely the user should be given a certain amount of TBO extension (as a minimum if the extension rate is low, medium or high). Furthermore the AMC should give indications what a low or high extension rate exactly means. For example FOCA foresees a maximum extension rate of 3 times the recommended TBO by the DAH (in practice a very well maintained engine with a low risk operation can remain in service for 36 years at most (TBO 12 years in calendar).
Without any boundaries the approach of giving TBO extension guidance is not sufficient and will still lead to a high variety of applications in the industry/within Europe.

Furthermore these guidelines should also be taken into consideration by the owner while using the possibility of a declaration of a maintenance programme (see above comments).

response

comment *651* comment by: *AOPA Finland*

2.3.1.

2. Part-ML should be applicable to ELA2 aircraft and helicopters, certified for up to 6 occupants and up to 2 000 kg MTOM including all types of operations.

response

comment *681* comment by: *René Meier, Europe Air Sports*

2.3.1 Description of the …"Light Part-M" option
Page 7
2. making Part-ML applicable to ELA2 aircraft
Remark:
Many thanks for this. We really welcome this new situation. Our question: What does the Agency mean by "including all types of operations"?

Rationale:
This needs to be clarified, the sentence as published leaves too much room for interpretations.

response

comment *682* comment by: *René Meier, Europe Air Sports*

Page 7

7. allowing independent certifying staff…
Question:
Why “and ELA1 aeroplanes” only? We would welcome an extension to ELA2 aircraft.

Rationale:
When it comes to technicality, there is not so much difference between ELA1 and ELA2 aeroplanes, within the framework of the risk hierarchy they are at identical levels.

response

comment *702* comment by: *Quality Manager Easy Balloons Ltd*

Item 1. Broadly agreed however the operation and maintenance requirements are unlike more complex aircraft and we feel a separate sub-heading for balloons should be applied.

Item 2. It is clear that balloons are not as complicated as helicopters or other ELA2 aircraft. The term ‘balloons’ should cover all hot air and gas balloons including simple hot air and gas airships however they are operated.

Item 4. Agreed in principle but the simplicity of balloons and data already provided means it would make little difference.

Item 5. In the case of balloons the MP adds very little apart from providing somewhere to list additional equipment requirements. It is probably a necessary evil but its application as far as balloons are concerned is very limited and in all cases it simply refers back to the schedule.

Items 6 & 7. There is much confusion with the ARC in the world of balloons and little real evidence that it needs to be as complicated and expensive as it is or indeed exist as a stand alone bit of paper. Originally one certificate was issued at the time of inspection both releasing the balloon to service (CRS) and stating that a Maintenance Review had been completed (CMR). I see nothing in completing an ARC that isn’t actually in the Schedule. It is also a nonsense to suggest that it can be extended without actually physically inspecting the balloon. We actively encourage private balloonists not to be in a CAMO and issue the release to service and ARC on the same day such that they expire on the same date the following year. This removes two dates from their diary, renewing the CAMO Agreement and having one date for the ARC and Inspection instead of two. On the other hand as most people have now just about got used to it and there would be cost implications to Part M Organisations if it were to be removed unless of course the appropriate Authorities reduced the fees for Part M holders.

response

2. Explanatory Note — 2.3. Regulatory Impact Assessment (RIA) — 2.3.2. Safety impact p. 7-9

comment *20* comment by: *CAMO Support Ireland*

2.3.2 (PAGE 9) THE FEED BACK REQUEST BOX REGARDING THE FITTING OF A PLACARD ETC. ADVISING THAT THE AIRCRAFT IS SUBJECT TO PART - ML
If the intention is to alert the public that the aircraft in question is subject to a more relaxed

	regulation and therefore the perception that the aircraft is somehow subject to less oversight then I disagree with this point entirely, The basis as I see it for Part-ML is to remove those parts of Part M that are not relevant to your typical GA aircraft. In fact one could argue that in reality this will improve things from a safety point of view in the sector a point EASA make them selves in the NPA.
response	

comment	*33* comment by: *BBAC British Balloon and Airship Club (UK)* **Nevertheless, the Agency is interested in receiving specific feedback on the following:** 1. Whether the aircraft should be marked (with a placard, for example) indicating that the aircraft is subject to the alleviated continuing airworthiness requirements of the Part-ML. 2. Whether the passengers should be informed (and how) about this fact. BBAC: Response to request for specific feedback: For balloons, there is no difference at all in safety and inspection standards between Part M and Part ML. Therefore we definitely reject any need for marking the aircraft or informing passengers. Moreover, passengers are most unlikely to be able to appreciate or understand any differences between the two regimes
response	

comment	*58* comment by: *BUHABS (Bristol University Hot Air Ballooning Society, UK)* You asked our view about installing placards and briefing passengers. This seems completely unnecessary for balloons since the safety and inspection standards under Part ML are no less than under Part M. So our response is a definite "no".
response	

comment	*68* comment by: *Richard ALLEN* "Nevertheless, the Agency is interested in receiving specific feedback on the following:" 1. The inspection standards and maintenance standards will be no different for Part ML, so no additional markings should be required. This information would be in the aircraft log book. 2. Passengers would not need to be informed - they are not likely to understand the meaning of such a notice, and it would only serve to confuse them. As the actual standards have not changed, this is not required.
response	

comment	*77* comment by: *Richard Nash* There would be no point in placarding a balloon or otherwise drawing passengers' attention to the fact that it is maintained undewr Part-ML since the balloon would still be inspected and maintained to the same standard as under Part-M.

response	

comment	*86* comment by: *Preece* I hope Ive got this in the correct place re Placards Part ML Another unneccessary expense for the owner - me. The aircraft log book contains the inspection and maintenace records, nothing else is needed There is therefore no need for any placard. Telling passengers about the specific maintenence regime - you will confuse all of them, bore most of them and frighten a lot of them away. This is not only unneccesary, it is counter productive. There is no benefit to this. I dont understand it properly, why should a passenger ?
response	

comment	*91* comment by: *Medical Officer BBAC* Nevertheless, the Agency is interested in receiving specific feedback on the following: 1. Whether the aircraft should be marked (with a placard, for example) indicating that the aircraft is subject to the alleviated continuing airworthiness requiements of Part-M 2. Whether the passengers should be informed (and how) about this fact. This is unnecessary in ballooning. Passengers would not understand the meaning of such a notice and it would give no reassurance above the already known safety reputation of ballooning within Europe.
response	

comment	*97* comment by: *Phil Dunnington* As maintenance standards and procedures are the same for all balloons there should be no need to distinguish between purpose of flight or inform passengers with placards or any other notification.
response	

comment	*105* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden* **Placard or Specal Briefing:** AOPA have a strong belief that this will not lead to a decreased level of safety and therefore a placard or special briefing is not necessary. Commercial operators will not use the selfdeclared AMP and will have a very similar level of maintenance as when complying to Part-M.
response	

comment	*107* comment by: *Pilot Niels Hvid* This is total nonsense. There are no difference what so ever between the two CAMOs in this perspective and you should always follow the manual from the manufacturer and SB, AD etc. It is hard enough for aviation owners to understand the rules, now you want passengers to do that? It makes no sense at all. It gives more administration and costs. Scrap that idea. The aircraft is airworthy and thats is. Stop all the detailing, it brings no safety what so ever to the area. The governing idea is safety, not policys. Do remember that, thank you.
response	

comment	*118* comment by: *andrew laing* I dont see the need for any palcard as there are no differences between now and an inspection under part ML and in any case passengers arnt liekly to read or even understand them
response	

comment	*125* comment by: *Andrew DAVIDSON* I cannot see any need for a visible plate to be carried in a balloon basket indicating that it has been inspected under a variation of the rules. What is important is that the balloon continues to be inspected periodically in accordance with current inspection regimes.
response	

comment	*130* comment by: *Richard Gyselynck* Feedback requested on 1 & 2: As a balloon owner I do not think is is useful or necessary. Placards on baskets will make no useful contribtuon to safety, passengers will not understand them and there are no differences in maintenance standards between M and Part ML.
response	

comment	*136* comment by: *Carillion* maintenance and inspection regimes are the same for both of these catagories so visual identification would be an unecessary and needless burden. Passengers know that British Balloon rides have to pass a level of safety/airworthyness. having a notice saying such is not going to benefit them. British systems do not reinforcing with notices to keep the public informed, technical information that could be included is highly unlikely to be understood by the layperson
response	

comment	*141* comment by: *Derek Maltby*

I do not believe safety will be enhanced by the aircraft being marked with a placard or any other means. There should be no difference in the standards of maintenance inspection as they currently occur and how it is proposed under Part ML. Passengers will not understand any significance of any placards or other markings.

response

comment *152* comment by: *Ian HEY*

The aircraft concerned are all certified aircraft maintained in accordance with EASA requirements. The fact that EASA has chosen to regulate different aircraft differently is not likely to be of interest to passengers. The aircraft do not need to be placarded for private flight. There is no need to inform passengers.
Consideration may be given to placarding aircraft used for aerial work or instruction.
Note: Part M Light is very different from the FAA "Experimental" category. The permit aircraft (in the UK) placard: "Occupant Warning. This aircraft has not been certified to an International Requirement" does not apply.

response

comment *159* comment by: *DE LOOF JEAN PIERRE*

data available add "including 2400 gliders"

response

comment *160* comment by: *DE LOOF JEAN PIERRE*

The aircraft slhould be marked with a placard indicating that the aircraft is under part ML conditions.

response

comment *171* comment by: *Merlin Balloons*

There is definitely no need to inform the passengers of the difference in standards of inspection and of the difference in standards of maintenance as they woud understand the difference anyway. And as there is generally no difference in standards of inspection and maintenance, the placards would mean unecessary extra work to put this in place.

response

comment *198* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016*

A difference between a "Part-M aircraft" and a "Part-M Light aircraft" is not needed.
Both typs of aircraft must have the same safety requirements!
Please compare this with your own car: Are there any differences in safty between a small car or a big car? No! Did you ever tell a passenger, that your car is inspected according miner rules? No!
The differences began with a truck or bus. In aviation this will be Boeing, Airbus etc... but never a sailplane a small single piston aircraft.

If you want a placcard, ok. But then, compare it with your own car, no additional paperwork! Today, in Germany, we have a documentation of about 8 pages paper for a sailplane and up to 20 pages for a small single piston aircraft. This have to be stopped!

response

comment *205* comment by: *Allie Dunnington*

2.3.1 Balloons - unlike aircraft - are still up-to-date mostly designed and manufactured by only one manufacturer. The manufacturers therefore provide all the needed and relevant information regarding the aircrafts (eg balloons) maintenance and safety standards. Each balloon is provided by the manufacturer with a comprehensive flight and maintenance manual.Whilst Light Part-M is ok in principle, MPs should not be necessary for balloons for the above mentioned reasons.

response

comment *207* comment by: *Allie Dunnington*

page 9

comments on request for specific feedback:

response

comment *208* comment by: *Allie Dunnington*

page 9 comment on informing passengers:

there is no need to for alerting passengers or having notices as a.) most pax won't see it and b.) won't understand it anyway. Passengers normally check the websites of operators or know the individual they are flying with and would trust that any inspections and maintenance has been done to the required highest standards. And in any case the procedures under Part ML wouldn't be any different than there are currently been done.

response

comment *225* comment by: *CAA-NL*

EN. 2.3.2 Safety Impact item 1
The EN states that with the new simpler and clearer rules understanding and implementation will be higher, resulting in a higher rate of compliance. Although this might be the case, it is questionable if the higher compliance will more than offset the lower standards. This has to be proven in practice over the coming years when Part ML will be implemented.
The NPA states that the current proposals will lower the cost of ownership. It does not take into consideration: - Possible higher insurance rates,- Less residual value of aircraft - Higher cost of unscheduled maintenance. Also, the assumption that the flying skills will increase due

to the lower cost of ownership is not well supported in the analysis.
The responsibilities of the operators who share one aircraft, e.g. a small ATO who dry-leases (temporary renting/hire for some hours a week) and a SPO operator who does commercial banner towing hiring the aircraft from the and the owner himself who flies private are not the same and hard to combine. Were the owner can manage his aircraft the commercial SPO operator still has to use a CAMO for the same aircraft.

response

comment *226* comment by: *CAA-NL*

Question 1, Data on numbers of ELA1 and ELA2 aircraft
Aircraft holding an EASA Certificate of Airworthiness in The Netherlands as per July 2015:

Aircraft Type	ELA 1	ELA2 not including ELA1	ELA2 including ELA 1	Involved in commercial operations
Sailplane	597	0	597	<10 (commercial ATO)
Balloons	197	230	427	Approx 380 of which all ELA2 are used for commercial purposes (80%)
Aeroplanes	304	140	444	Approx 300 (75%)
Helicopters upto 4 pax below 1,200 kg MTOM			25	Note 1
		Total EASA ELA2 a/c:	1,493	

response

comment *227* comment by: *CAA-NL*

Question 2, Information to Paying Passengers in CAT (including A-A)
The proposals gives the possibility to remove of a number of standards safety barriers while relying on the responsibility of the owner to design mitigating measures. The NPA has not provided a proper risk assessment (hazard, effect, likely hood) to support these possibilities. For instance, for an ELA2 aircraft used for commercial operations (CAT A-A or commercial ATO), five safety barriers can be removed, and without proper mitigating measures by the owner this could result in lower safety standards:

Current reg	Proposed by NPA	Possible consequences
Approved Maintenance Program	Declaration of Maintenance Program	No structured AMP acc. AMC Appendix I available

Maintenance Program i.a.w. TC holder ICA	Maintenance Program may deviate from ICA. For instance, NO Cessna SID, NO engine TBO	Less maintenance on critical structure/systems
CAW managed by CAMO	CAW managed by operator/owner	Less knowledge and experience. Less preventive maintenance. Drive for cost reduction in lieu of safety
Airworthiness review by CAMO/CAA	Airworthiness review by independent certifying staff, combined with annual inspection	No independent check, risk of conflict of interest
Maintenance by approved maintenance organisation	Maintenance by independent certifying staff	No check on 6 months experience in last 24 months on type/configuration. No control on calibrated tools

In line with the introductory comment, we would only accept this if, when the operator uses the alleviations possible with Part ML, the passenger will be informed if alleviations are used and which mitigating measures are in place as alterative for the normal standards at the time of purchase of the ticket. Although we wonder if the unknowledgeable passenger who is buying a ticket is able to grasp the possible consequences of that information on his risk profile.

response

comment *300* comment by: *Jos TREHERN*

Re: Nevertheless, the Agency is interested in receiving specific feedback on the following:

These actions are totally unnecessary for balloons. Firstly, there are no changes to the current standards of inspection or of maintenance to those that would be under Part ML. Thus, placards on the balloon basket or the informing of passengers is not required. It is also highly unlikely that any differences would be understood by passengers anyway.

response

comment *305* comment by: *The Norwegian Air Sports Federation*

Item 3, 4, 5 and 6:
Marking of the aircraft with signs and placard is **not** an idea, which NLF supports. Such marking is already in place in many countries for experimental aircraft, and for this purpose, the marking/placard serves a certain purpose quite well. With "EXPERIMENTAL" in capital letters on the fuselage, a passenger (or pilot) on a private flight in a home built aircraft will be aware that the aircraft somehow differs from regular, certified aircraft. If the passenger is in doubt what "experimental" means, the placard in the cockpit provides slightly more explanation, for instance as applied in Norway and in the US:

"PASSENGER WARNING—THIS AIRCRAFT IS AN EXPERIMENTAL AIRCRAFT AND DOES NOT COMPLY WITH FEDERAL SAFETY REGULATIONS FOR STANDARD AIRCRAFT"

The question is whether a placard of a similar sort giving further details about which set of maintenance rules have been used in the maintenance of a certified aircraft can provide the pilot and/or passenger with valuable information, from which he or she can make his/her own risk assessment. In particular, can a passenger be expected to understand the differences in risk between an "EXPERIMENTAL" placard and a "PART-ML" placard? Most likely, not! If the Agency would agree to transferring all ELA-1 and ELA-2 aircraft into the experimental category (i.e. into annex II to the basic regulation), such a placard could perhaps make sense. If not, the placard is more likely to confuse than to inform.

It has to be emphasised: An aircraft maintained under Part-ML has a TCDS, a C of A, an ARC and is supported by the rigorous standards of European aviation. This includes ADs published according to set procedures, and the aircraft will be maintained with any and all ADs performed, and in line with all ALIs, CMR and ICAs. Still, labelling as suggested is something the general public will most likely associate with homebuilt aircraft maintained by a layman, without any TC. The placard will be confusing at best, misleading most likely.

NLF would like to argue that if the Agency believes that complying with all ADs, ALIs, CMR and ICAs (in addition to all other requirements in the minimum inspection programs) is not sufficient to maintain "standard" airworthiness of an aircraft, then there is something wrong with the ADs, ALIs, CMR and ICAs – not the applied maintenance scheme under Part-ML.

Furthermore, until Part-M was adopted in Norway, private aircraft was issued with a C of A by the CAA after a simple maintenance report provided by the aircraft mechanic. The previous system was simpler than Part-ML in most respects, and the Cessna 172s until the late 2000s were flying safely with no label or placard.

In short: No placard is needed unless Part-ML is entirely scrapped in favour of very simple maintenance standards as used for experimental aircraft.

Item 7 and 8:
By reference to our comment # 304, we again would like to challenge why the alleviations do not include ELA-2 aircraft. The EASA Regulation on General Aviation clearly states:

"Principle 2: All regulation should be screened against the backdrop of the above risk hierarchy and resulting need for protection."

Screening the proposal in item 7 against the risk hierarchy, shows there is no case to exclude

	ELA-2 aircraft.
response	

comment	*337* comment by: *Howard Torode* Comment by European Gliding Union Making PML applicable to ELA2 aircraft The level of complexity of airframes in ELA2 is not significantly greater than that existing in ELA1. Therefore we support this proposal , noting thst it is of little practical interest to gliding as the vast majority of our airframes are ELA1 (a few tugs accepted).
response	

comment	*338* comment by: *Howard Torode* Comment by European Gliding Union Placarding to indicate an aircraft is subject to P-ML The 'alleviations' offered in PML only extend to the likely qualification and experience of the authorised personnel performing the maintanance/airworthiness. The ACTUAL standards of airworthiness provided are essentially identical to PartM. Therefore we consider that there is no alleviation of the required standards, and so no placarding is necessary.
response	

comment	*375* comment by: *Cameron Balloons Ltd* There has been no change in the standard of maintenance inspections for balloons from before EASA, during the current period under EASA and there is no intention to change under Part ML, so specific feedback is not necessary and adding any signage to advertise the balloons status would not be understood and would confuse passengers.
response	

comment	*377* comment by: *BGA* *2.3.2 Making PML applicable to ELA2 aircraft* *Page 8* The level of complexity in ELA2 is not a significantly greater than that existing in ELA1. Therefore we support this proposal, noting that it is of little practical interest to gliding (all ELA1 except a few tug aircraft).
response	

comment	*389* comment by: *Ministry of National Development*

For the first issue the hungarian answer is the follow:

To mark the aircraft (with a placard or otherwhence) is not important. The aircraft must be complied with the requirements by the manufacturer and the AMP must be developed by the operator, what can ensure the appropriate level of safety. Therefor the level of safety won't change from a placard or else.

For the second issue the hungarian answer is the follow:

The passengers who avail oneself of such services of aircrafts (usually) they do not know or hardly know the aviation rules, and the fact that the chosen service is operated with Light requirements could be frightening. Therefor passengers should not be informed about the this fact.

response

comment *398* comment by: *European Balloon Federation*

The extension of applicability from ELA1 (as per Opinion 10/2013) to ELA2 (in this NPA) is welcomed. In the case of balloons it is considered as a recognition that there is no difference between the physical maintenance and inspection standards between the two.
Similarly, there is no difference in these standards between part M and part M-L. As such there is no requirement for marking of the aircraft to record the fact.

Additionally, there is no need to inform passengers of this fact – the information would be meaningless to them. The most that any passenger would likely wish to know was that there were some appropriate regulations in force to ensure the aircraft airworthiness and that they were being followed.

response

comment *399* comment by: *European Balloon Federation*

Re safety impact of items 7&8 of 2.3.1 of the RIA:
EASA states that these items will be limited to NCO ops until experience is gained. However, in the case of balloons, this was generally the situation pre-EASA, where there was no difference in maintenance methods between commercial and non commercial operations, so surely that evidence is already there and these alleviations could be extended to all types of operations?

response

comment *403* comment by: *Swedish Transport Agency*

(p9) **Nevertheless, the Agency is interested in receiving specific feedback on the following:**
1. Whether the aircraft should be marked (with a placard, for example) indicating that the aircraft is subject to the alleviated continuing airworthiness requirements of the Part-ML.

Comment:

- *STA cannot see what the placard contributes too. The passenger will probably not know what Part-ML is and understand the consequences.*

2. Whether the passengers should be informed (and how) about this fact.

Comment:

- STA CANNOT SEE WHAT THIS INFORMATION CONTRIBUTES TOO. THE PASSENGER WILL PROBABLY NOT KNOW WHAT PART-ML IS AND UNDERSTAND THE CONSEQUENCES.

response

comment *416* comment by: *FAA*

Page 8
Bullet:
It ensures that the introduction of any future SMS organisation requirements does not affect Section A of Part-ML (organisation requirements are kept in Part-M and Part-145).

Comment:
The FAA applauds EASA's effort to eliminate SMS requirements for this segment of the general aviation (GA) community. This is an important philosophical step in reducing the regulatory burden for GA.

response

comment *419* comment by: *FAA*

Page 9 Highlighted text box
Nevertheless, the Agency is interested in receiving specific feedback on the following:

1. Whether the aircraft should be marked (with a placard, for example) indicating that the aircraft is subject to the alleviated continuing airworthiness requirements of the Part-ML.

2. Whether the passengers should be informed (and how) about this fact.

Comment:
The FAA feels that placards should only be used to indicate if an aircraft holds something other than a standard airworthiness certificate (experimental, restricted, limited, light sport, etc.). Any additional details regarding the airworthiness requirements to which the aircraft is subject would likely be meaningless to passengers, and would do nothing to enhance public safety. It would also set an undesirable precedent regarding the addition of aircraft markings.

response

comment *441* comment by: *flyingadverts*

ML should cover all hot air for private or commercial or other use.

response

comment	*446* comment by: *flyingadverts* This is completely unnecessary, there are no differences in standards of inspection Placards on the basket informing passengers is not required at all. Passengers are unlikely to understand what this means
response	

comment	*455* comment by: *Chris Davies* I do not support this idea it has no merit
response	

comment	*471* comment by: *Cary Crawley* With regard to 2.3.2 I do not accept the idea that maintenance standards of hot air balloons used for commercial passenger flying (in any of it's guises- such as "cost sharing", "introductory flights", "experience flights" or honest passenger-pleasure flights) should be in any significant way reduced in proportion to those offered in any other form of commercial aviation. Neither do I consider it appropriate that a reduction in appropriate maintenance standards would be acceptable if a "placard" was used to identify a reduction in the designated regulatory" safety standard" of the aircraft's maintenance.
response	

comment	*481* comment by: *René Meier, Europe Air Sports* The consequence Page 8 Remark: We fully agree. Rationale: As stated earlier, there is no fundamental difference between an ELA1 and an ELA2 aircraft.
response	

comment	*482* comment by: *René Meier, Europe Air Sports* Regarding the persons flying on the aircraft: Page 9 Remark: We think passengers always are well informed and never were of the opinion that a "Trinidad" maintenance is undertaking according to rules in place for an A380. Rationale:

	It always has been obvious to all of us that different sets of rules must be in place for different operations.
response	

comment	*483* comment by: *Luftfahrt-Bundesamt* Attachment #2 Attached please find the table giving an overview of the aircraft registered in Germany.
response	

comment	*527* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland* From our point of view, there is no need to inform the passengers because they are not able to judge the differences between Part M and Part ML. Additionally, it is important to prevent any discussions and confusions between the crew and the passengers.
response	

comment	*529* comment by: *René Meier, Europe Air Sports* Nevertheless… Page 9 Remark: Please no such placard. Should we then prepare texts declaring the different maintenance regimes to passengers booking a pleasure flight? Bye-bye pleasure, then! Rationale: This adds to confusion only, and provokes explications to the passengers by the pilot/operator, probably in critical phases of a flight. Remember the "sterile cockpit initiatives the Agency started not very long ago.
response	

comment	*531* comment by: *GAMA* Regarding the agencies request for data from member states that shows any proposed alleviations will not result in a detriment to safety; GAMA offers the following that supports the concepts of Part M phase II and would also be supportive of an additional expansion of scope beyond the proposed applicability of ELA 1 and ELA2 aircraft. EASA recognizes the need to establish more proportional continuing airworthiness rules to provide an appropriate level of safety for the general aviation community. EASA also took the necessary step to reserve any future efforts and base them on data from member states and experience from Part M initiatives. GAMA supports this approach and encourages EASA to also review experiences from other aviation regulatory agencies. For example, the FAA's rules governing the maintenance, preventive maintenance,

rebuilding, and alterations take a different approach than EASA. The FAA recognizes the owner or pilot as having the primary responsibility for maintaining the aircraft in an airworthy condition under the appropriate maintenance requirements based upon operational usage and complexity of aircraft. For non-commercial operations, the owner or operator is required to have the aircraft maintained by appropriately certificated person, under the minimum inspection requirements of CFR Part 43, and portions of parts 91, among others. The FAA places continuing airworthiness responsibility on the owner or pilot, establishes a minimum inspection requirement that must be accomplished by appropriately certificated person; rather than a requirement to develop a unique specific maintenance program and requiring the continuing airworthiness responsibilities be fulfilled by an organization.

In support of EASA's data request, GAMA would like to submit that, under the US system, the existing airworthiness standards have promoted a safety culture that encourages maintenance practices that have resulted in the average age of a single engine piston aircraft in the US is nearing 50 years old. In fact, According to the 2014 General Aviation Data book section 2.11 Average Age of Registered U.S. General Aviation Fleet, single engine piston aircraft (in 2008) with 1-3 seats had an average age of 48.1 years; 4 seats of 38.2 years, 5-7 seats of 33.5 years; and 8 seats at 49.3 years. Further, multi engine piston aircraft (in 2008) with 1- 3 seats had an average age of 48.9 years; 4 seats of 36 years; 5-7 seats of 39.3 years; and 8+ seats of 41.6 years.

While the above data is only a representation of a portion of the general aviation community, it reflects GAMA's position that an expansion beyond ELA1 and ELA2 would be supported by decades of proven successful maintenance practices and data under the US system. GAMA requests that EASA consider expanding the scope of these efforts, evaluate the concept of eliminating the need for a maintenance program, and re-examine the need for an organization managing the continuing airworthiness of aircraft involved in certain commercial operations.

GAMA appreciates your attention to these comments and would welcome the opportunity to answer any questions regarding our feedback.

response

comment

532 comment by: *René Meier, Europe Air Sports*

Item 7 and 8
Page 9
Remark
Thank you for granting more privileges to individuals. From that point of view *"(*Limited) pilot-owner maintenance" in our view is not yet sufficient.

Rationale:
More could have been proposed, particularly when it comes to the 100 h/annual check. In the end, in sports and recreational aviation always the owner is responsible for the airworthiness of the aircraft.

Specific points should be re-checked:
Appendix I (b) – 4,5,7 and 9 – should be revised.

	7: IFR operations does not fit the principle of encouraging IFR for private pilots considering the provisions in place for the Competence-based Instrument Rating (CB-IR) and the En-route Instrument Rating (EIR), it is counter-productive since it discourages the use of a battery charging procedure if required. From the technical point of view ELA2 aeroplanes do not represent a higher risk than ELA1 aeroplanes as published in the General Aviation Roadmap.
response	

comment	*533* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland* Attachment #3 Please find enclosed a list raised by FOCA of all ELA 1 and ELA 2 aircraft registered in Switzerland.
response	

comment	*564* comment by: *Colin Wolstenholme* Feedback as requested on 1 and 2 There is no identified need for any marking or placard. Passengers are unlikley to understand it, it will not make anything safer. It's totally unnecessary. The inspection regime or maintenance now or under this proposed Part ML is teh same, therfore there does not seem to be a requirement for anything such as a 'placard'
response	

comment	*569* comment by: *Irish Aviation Authority* As of 1st October 2015, the Irish civil register contained the following: 10 Balloons (ELA1) 22 Sailplanes/Powered Sailplanes (ELA1) 95 Aeroplanes < 1,200kg (ELA1) 11 Rotorcraft < 1,200kg 15 ELA2 aeroplanes (not balloons/sailplanes and not ELA1) 6 1,200kg < Rotorcraft < 2,000kg
response	

comment	*571* comment by: *Irish Aviation Authority*

A placard indicating that the aircraft is subject to Part-ML would not be easily understood by a member of the General Public.

Persons engaging in sport aviation, in light aircraft, should not expect the level of safety to be "identical to that of airline operators" (Commerical Air Transport).The objective of Part-ML is to reduce the burden on the General Aviation community.

Requiring additional placards in the aircraft would pose an unnecessary additional burden on the community, without any significant benefit.

response

comment *594* comment by: *ULTRAMAGIC, S.A. (JVT)*

ULTRAMAGIC does not consider necessary to include any Placard nor Information to the passangers regarding the continuing airworthiness requirements applied. The general public has none or very little knowledge about the Regulations on Continuing Airworthiness and information about this does not contribute to the safety of the flight. Whenever this is necessary, this information is contained in the latest ARC, which must be carried on board.

response

comment *653* comment by: *AOPA Finland*

The Agency should rule mandatory for NAAs to deliver aviation statistics on:

- aircraft registered, separated in types and classes
- aviation medical certificates, separated in classes
- airworthiness and maintenance oversight operations
- aviation accidents
- number of licences, training permits and training approvals for each flight crew licenses
- flight operations, such as flight hours and the oversight of air operators and training

Lack of reliable aviation statistics on European level deteriorates the credibility of EASA's investigation, studies and rulemaking because there is no scientific research background on any rulemaking process.

response

comment *683* comment by: *René Meier, Europe Air Sports*

Item 9; This guidance...
Page 9
Remark:
Most important: Such a guidance as a recommendation remains a recommendation, a guidance, repectively, does not become "hard law" in anyone of the member states..

Rationale:
Recommendations, Acceptable Means of Compliance and Guidance Material never were meant to be "hard law", but we still have to fight to avoid such transformations. Isn't the principle that the one who declares/approves the programme, does the judgement? Can we

	force an NAA for more alleviations, if the NAA approves the program? Isn't the approving body the one to do the interpretations/judgements?
response	

comment	*687* comment by: *Balóny Kubíček* Refer to page 9 of 77, specific feedback note AD 1 - not at all. It is already PIC duty checking validity of ARC. This is more than enough. Such placard/marking would just duplicate the ARC. AD 2 - not at all. They do not understand this. They ask as where are those sand bags and have no idea about EASA and its maintenance requirements. They can ask and PIC will answer. This is the most proper way how passenger can be informed.
response	

comment	*698* comment by: *European Sailplane Manufacturers* We feel that such a marking would be useful. 1) the owner would have one incentive more to decide if he/she really wants to take this decision to take over more responsibility. 2) no pilot would be in doubt if this aircraft is operated in this regime or the other. 3) also each maintenance or CAMO organisation would see immediately the status. 4) and last but not least it should be fair against any passenger that he/she is informed that this is an aircraft which is operated under simplified rules.
response	

comment	*703* comment by: *Quality Manager Easy Balloons Ltd* Nevertheless, the Agency is interested in receiving specific feedback on the following: 1. Whether the aircraft should be marked (with a placard, for example) indicating that the aircraft is subject to the alleviated continuing airworthiness requirements of the Part-ML. 2. Whether the passengers should be informed (and how) about this fact. I am rather concerned that EASA think that different standards are applied to the physical inspection of an aircraft. I should image that explaining the differences to passengers or participants in the sport would cause them to expire from boredom. Unworkable.
response	

2. Explanatory Note — 2.3. Regulatory Impact Assessment (RIA) — 2.3.3. Environmental impact p. 9

comment	*344* comment by: *Howard Torode* Comment by European Gliding Union Standardisation of the form of the CRS Historically many nations' gliding federations have allowed the aircraft log book to be the agreed location for formal CRS signatures. There have never been any problems of principle for this practice, which enables clarity, and provides a focus for record keeping. Even given the proposals to combine scheduled maintenance and ARC review, we consider this policy to remain workable.
response	

comment	*378* comment by: *BGA* *2.3.2 Placarding to indicate aircraft is subject to PML* *Page 9* In our view the 'alleviations' offered in PML only extend to the likely qualifications and experience of the authorised personnel performing the maintenance/airworthiness. The actual standards of airworthiness provided are identical to Part M. Therefore we contend that there is alleviation to the requirements compared to Part M, and no placarding is required or justified.
response	

2. Explanatory Note — 2.3. Regulatory Impact Assessment (RIA) — 2.3.4. Social and economic impact p. 9-10

comment	*87* comment by: *Preece* You are wrong, there is an environmental impact. All these regulations consume huge amounts of paper and electricity in people sitting at their computers trying to understand it all. I am spending probably an hour making a few points, a lot longer in reading through some of this. I am not alone.
response	

comment	*112* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden* **Fees and Charges:** AOPA appreciates that EASA takes a clear stand against high fees and charges. In many countries the ineffective scheme of charges has a negative effect on competition and even though it is not in EASAs power to change this, we are happy to see that you make this statement.
response	

comment	*114* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA*

Sweden

Economic effect: Less money for the competent authority and CAMOs can, in this case, never be seen as negative. It is a matter of proportionality and we cannot defend gold-plating just because it is good business for some. On the long term we see a huge opportunity for maintenance organisations and certifying staff since this is meant to increase the number of airworthy aircraft. With a larger costumer base paying a bit less it is a win-win for everybody.

response

comment *228* comment by: *CAA-NL*

EN. 2.3.4. Social Impact.
The NPA page states that the current proposals will lower the cost of ownership. It does not take into consideration: - Possible higher insurance rates,- Less residual value of aircraft - Higher cost of unscheduled maintenance. Also, the assumption that the flying skills will increase due to the lower cost of ownership is not well supported.
Further the NPA states: "Nevertheless, this reduction in the cost of ownership can only be fully achieved if Member States ensure that this increase of privileges for individuals is not impaired by an inadequate system of fees & charges." All F&C systems of the Member States are by definition adequate as they are all endorsed at national political level. Competent Authorities primary task is to enhance safety and not to generate revenues, F&C are a political decision to apply the user pay principle. It is not for the Agency to make these kind of statements.

response

comment *321* comment by: *The Norwegian Air Sports Federation*

The social impact mentioned with regard to competent authorities is not relevant in our view. An authority is not a business – it is there to support the industry, and when the industry no longer needs a certain service, the authority can either use its resources on more important aspects than e.g. approving maintenance programmes for light aircraft, or it can reduce its staffing and cut costs to the benefit of the tax payer / aviation industry.

As far as the social impact on maintenance organisations are concerned, they will overall benefit since they get more privileges, and because less costs for bureacracy means more flying – and more flying means more maintenance.

The CAMOs, on the contrary, will most likely experience a negative impact, since their services will be less relevant by regulation. However, this also opens new windows for competition and services. When a CAMO is liberated from the chains of approving a maintenance programme (hence no longer putting its head on the block if it approves a TBO extension), the organisation may be better suited at advising recreational pilots in a non-binding manner, sharing their expertise to the benefit of the community. The CAMO can also manage the maintenance with new online analysing tools and services, as we have seen in the US market (for instance as provided by Savvy Aircraft Maintenance Management, https://www.savvymx.com).

response

comment	*354* comment by: *Kevin Meehan* The requirement to inform passengers - either verbally or with a placard in the basket is not required. There is no difference for the inspection and maintenance of the balloon under present regulations and the proposed PART ML - so why do we need a placard or to inform passengers ?
response	

comment	*379* comment by: *BGA*
response	

comment	*388* comment by: *BGA* *2.3.5 Possibility of owner declaration of maintenance programme in scope of PML Page 10* This is supported in principle, particularly if other measures (herein) enable group, or generic maintenance programmes, or maintenance programmes produced in the future by manufacturers, that include the MIP. However some level of acceptance or audit would probably be required before an approved body or person committed to the execution of such an MP .
response	

comment	*421* comment by: *FAA* Page 9 Section: deferment of certain defects by the pilot Comment: It may be worth noting here that the additional training and guidance necessary to allow these deferments will enhance safety for all general aviation pilots (even those who are not aircraft owners) by increasing their awareness of maintenance techniques and practices.
response	

comment	*424* comment by: *FAA* Page 10 Section: Pilots would obtain more privileges related to deferment of defects to the detriment of independent certifying staff and maintenance organisations. Comment: It should be noted that this rule not only has the potential to increase aircraft utilization, but also bring new entrants into the community of aircraft owners. Because many of these will be first time owners, they will likely turn to CAMO's, at least initially, for maintenance work. Both facts should offset much of the lost revenue CAMO's may experience.

response

comment *547* comment by: *GIPAG France (French General Aviation Operators Professional Union)*

NPA's proposal represents a loss of business for CAMOs that have invested in IT and human resources to meet the requirements of the authority regarding aircraft airworthiness. And suddenly, this change will undermine their efforts, especially for some companies, for whom being a CAMO is the only activity.

response

comment *591* comment by: *René Meier, Europe Air Sports*

Nevertheless, this reduction…
Page 10
Remark:
Many thanks for this statement! We shall carefully check the levels of taxes imposed on us by the competent authorities, and we shall fight against any increase in fees and charges not contributing to safety.

Rationale:
The Agency's perception reflects our concerns.we know that there loom some fees and tax increases on the horizon in some counties which will completely burn what is gained by the possible reduction of costs as outcome of the provisions of this NPA.

response

comment *593* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

See also our comment under 2.3.1, number 3

response

comment *598* comment by: *René Meier, Europe Air Sports*

On the other hand…
Page 10
Remark:
We think, General Aviation, particularly the sports and recreational segment, never favoured the "CAMO idea", we always had our doubts, because from our view this solution is too much "document-centric" instead of putting the aircraft in the center of the process. However, good relationships were created and fruitful exchanges took, and will take, place at CAMO-level.

Rationale:
There is no contribution to safety, nor to maintenance quality. The aircraft are less inspected than the aircraft related papers, because in many cases there is no time left to take a serious at an aircraft after having inspected all the papers. Today's solution is not risk-based, not appropriate, not proportionate to our activities. A private owner will have fixed funds for flying and maintenance. With a fixed maintenance budget, the more is spent on paper, the

less can be spent on practical work on the aircraft. With a fixed flying budget, the more is spent on maintenance, the less is spent on flying, contributing to less activity and less skilled pilots. At the same time, pilot error is a more common cause for GA accidents than maintenance defects. This is a clear hint to what must get more attention in the future.

The negative effect on maintenance organisations...
Page 10
Remark:
As close ties exist between many maintenance organisations and our members we know about the fears of today. We think, however, that more flying will create more work for them and that in addition with a shift of the scope of the entire maintenance business in direction of services to the customers new activities could be created, a much greater volume of business generated, a safe future maintained.

Rationale:
There was a life before CAMO, probably a better one, so there will be a life with, and after CAMO, probably asking for changes, but changes are required everywhere to stay in business.

To the detriment of…competent authorities

Remark:
We think competent authorities will act in favour of these proposals.

Rationale:
With less work to do for GA more resources will become available for other sectors of oversight undertaking more complex operations . Most of the action points following the GA roadmap are linked to alleviations, which may lead to less work for the competent authority. In our view, competent authorities also have to review the scope of their activities from time to time. Such changes always are a chance to adjust activities best serve to serve the customers and to adjust the activities to the needs of the industry.

response

comment *600* comment by: *René Meier, Europe Air Sports*

Page 10
Remark:
For sure there will be no negative effect on the maintenance organisations, we see positive effects only.

Rationale:
There will be more flying, as a consequence, there will be more maintenance work to be done.

response

comment *606* comment by: *FNAM (French Aviation Industry Federation)*

NPA's proposal represents a loss of business for CAMOs that have invested in IT and human

	resources to meet the requirements of the authority regarding aircraft airworthiness. And suddenly, this change will undermine their efforts, especially for some companies, for whom being a CAMO is the only activity.
response	

comment	*648* comment by: *DGAC France* As concerns the proposed RIA, it seems at the present time more qualitative than quantitative. Further to the inputs furnished by stakeholders on economic impacts introduced by the draft rules, as requested in § 2.3.7, DGAC France will be interested in a more quantitative risk impact assessment.
response	

comment	*657* comment by: *AOPA Finland* To promote the growth of the lighter end of GA community EU and EASA should • remove excise taxes from aviation fuels used by GA aircrafts • allow VAT deduction right to deduct VAT for aircrafts with a MTOM under 1,550 kilograms, as well as goods and services related to their use • enforce actively NAAs that they promote European Council Directive 96/67/EC's Article 7, allowing self-handling on airports. See 1.3 Ground handling https://ais.fi/ais/eaip/pdf/aerodromes/EF_AD_2_EFHK_EN.pdf.
response	

2. Explanatory Note — 2.3. Regulatory Impact Assessment (RIA) — 2.3.5. General aviation and proportionality issues p. 10-11

comment	*199* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016* Please stopp the nonsence of a maintenance program! Especially for a "self declaration"! Any aircraft has his maintenance manual. If all the services were done in the correct oder against the maintenance manual, the aircraft is safe. There is no additional input in safety with a maintenance program. Please compare it with your own car. Any vehicle on our roads are much complex than any sailplane or single piston aircraft. Did you ever wrote a "self declaration" to do all the maintenance? Do you think this will be necessary? Then do it!
response	

comment	*340* comment by: *Howard Torode* Comment by European Gliding Union

Possibility of owner declaration of maintenace programme in scope of PML

For light sport aivation inc. gliding, this is supported in principle, particularly if other measures herein enable group, or generic maintenance programmes, or maintenance programmes produced in future by manufacturers that include the MIP measures. However some level of acceptance or audit of the programmes would probably be required before an approved organisation or person committed to the execution of such an MP.

response

comment *472* comment by: *Cary Crawley*

Please kindly explain how we might continue to identify the aircraft (a hot air balloon used for commercial passenger flying under all the pretentious and denied guises and including those publicly and honestly identified) has been kept and maintained within a "controlled environment" and maintained with approved and traceable components under these revised circumstances.

response

comment *601* comment by: *René Meier, Europe Air Sports*

2.3.5 General aviation and proportionality issues
Page 10
Remark
We fully support this statement.

Rationale:
Costs for private and club operations will decrease, the number of flight hours will increase, so will flight safety, because the latter two figures are closely related.

response

comment *627* comment by: *EFLEVA*

The important point is made that Member States must ensure that they introduce appropriate charges for activities and approval processes, etc., connected with Part-ML. EASA should offer specific guidance to the NAAs of Member States to ensure that the anticipated cost of ownership reduction is not reduced by NAA fees and charges.

response

2. Explanatory Note — 2.3. Regulatory Impact Assessment (RIA) — 2.3.6. Impact on 'better regulation' and harmonisation p. 11

comment *69* comment by: *Richard ALLEN*

"Take the opportunity to simplify the existing rules.." - this is excellent to see. It should mean reduced costs for the GA industry, and therefore more people being able to get

	involved, thus allowing GA to continue as a sport and hobby, plus as the first step towards CAT.
response	

comment	*200* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016* The opportunity to a "better regulation" is: Only the maintenance manual for an aircraft is the rule! All your hundreds, thousands rules are not necessary. You can cancell them and the safety of an aircraft will be the same as in the last hundred years. But then, your agency is obsulate ...
response	

comment	*381* comment by: *BGA* **Segment description Explanatory note 2.3, RIA 2.3.7 Conclusion Page 11** *Request for comment on economic impact of these draft rules:* BGA views: While the actual measures of PML have served to broaden the scope of those authorised to carry out specific functions of maintenance organisation and CAMO, these measures will require significant changes to working practices, in addition to those already being implemented under previous adjustments (specifically EC 1088/2015 and Part 66). This patchwork of detailed changes can only be fully understood by cross reference to Part M itself and other rules makes the appreciation and understanding of this measure overly complicated and the impact on those approvals needed unclear. The ultimate penalty for this is a non optimum economy of service. From our organisation's point of view, (as an approved organisation), this will precipitate a much deeper review of our practices that these simple measures might suggest. Our business model, and the approvals we have secured to date (at significant cost) will need to be reviewed for their added value. It is unfortunate that a wider review had not considered the whole issue of approvals for organisation involved in, or serving, low risk sport aviation, as a possible application of proportionate regulation. From the point of view of our owner/operators, these rules will undoubtedly broaden their choice of options. However, even in this area, economic and safe progress will only be secured if the rule is published in a concise and clear, free standing manner.
response	

2. Explanatory Note — 2.3. Regulatory Impact Assessment (RIA) — 2.3.7. Conclusion p. 11

comment	*34* comment by: *BBAC British Balloon and Airship Club (UK)* **Stakeholders are kindly invited to provide data on economic impacts introduced by these draft rules and any other quantitative information they may find necessary to bring to the attention of the Agency.**

BBAC: We are clear that Part ML should be implemented for the benefit of owners / operators. In some EASA states, complex and expensive structures of CAMOs have been set up to work under Part M with additional "gold plating". As is stated in the introduction to the NPA, the objective is to increase the amount of active light general aviation. This will not be achieved by trying to protect existing CAMOs at the expense of owner/operators. For balloons especially, we submit that the move towards maintenance and certification by independent staff and by MOs, rather than control by CAMOs should be welcomed. OVERALL WE SEE POSITIVE ECONOMIC BENEFIT FOR BALLOONING SECTOR BY THE PART ML CHANGES AS WRITTEN BUT WE URGE YOU TO GO MUCH FURTHER AS WE ADVOCATE IN OTHER COMMENTS.

Please consider that the "barrier to entry" for individual owners to participate in this CRT process is significant, so please take heavy notice of the submissions from user bodies such as the European Ballooning Federation.

response

comment *59* comment by: *BUHABS (Bristol University Hot Air Ballooning Society, UK)*

As a sporting club, we find it very difficult to work under complex and apparently unnecessary regulations. The complexity and costs in aircraft maintenance / airworthiness and in pilot training and licensing make it increasingly difficult to attract new pilots and crew into the sport. Moreover, we see many pilots giving up. The sport feeds the industry (such as there is left now) and so damage to the sport compromises also the industry. Concerning Part M, we see no benefit at all in the complex ARC requirements introduced in 2008-9. Balloons are so simple than the ARC and AMPs are not necessdary. For the sport to have some chance to recover, we need all unnecessary regulation removed. Part ML seems to show good intention but no substantial progress.

response

comment *70* comment by: *Richard ALLEN*

"Stakeholders are kindy invited..." - The current Part M system is the cause of much confusion among balloon owners (I have experienced this in the last few days with a friend who owns a balloon, and is still confused as to why an ARC is required as well as the CRS on the annual inspection). For balloons the ARC adds an extra layer of paperwork, but does not increase safety in any way (it should be incorporated onto the CRS paperwork that is issued after a successful inspection). It also adds to costs, as it is extra work required by the inspector and also the national body to administer the ARC. Consequently, it is a contributing factor to people giving up ballooning due to the increasing costs associated with balloon ownership. (In the UK the cost is 80GBP per balloon - solely due to the ARC.)

response

comment *76* comment by: *Richard Nash*

Part-M has not had any effect upon the safe operation of balloons but has increased the cost of operation. This increase is having a negative impact upon the numbers of people engaging

	in the sport with no corresponding benefit.
response	

comment	*88* comment by: *Preece* Again I hope I have my comments in the correct place. I am struggling to understand this huge document. You regulators may not think it huge but I do. All I want to do is enjoy my balloon. You are paid to read and produce these documents, I am not. All these excessive rules are spoiling my fun. There are extra costs for all the new paperwork that must be done, I have to pay these costs. I do not want to pay for it, the inspectors probably do not want to spend their time producing it. It is a strong reason why I do not want to be an inspector. Again, I am not alone in these views. People are leaving the sport at a faster rate than they are joining, cost and beaurocracy are contributing to this. If the paperwork burden gets worse there will be fewer inspectors, costs will rise, more people will give up, it is a vicious circle. Part M, ARC, all replace the previous simple annual inspection, which is all that is required for simple aircraft. I am interested in balloons, but I suspect the same applies to the other types of light aircraft, gliders, microlights, etc. Amend the Basic Regulation to remove maintenece programme A balloon doesnt need a maintenece programme. It needs an inspection and any issues arising to be addressed. The manufacturers manuals already cover this, no more is required. There are already rules about the intervals in which certain items have to be inspected/replaced/etc, thats it. No more please. All you need say is something like "follow manufacturers maintenece manual". It follows that a specified maintenence organisation is also not needed. This is jumbo-jet regulation applied to everybody, it is not appropriate. I understand that balloons and other light aircraft could all be categorised in Annexe 2.
response	

comment	*92* comment by: *Medical Officer BBAC* Ref: Stakeholders are kindly invited to provide data on economic impacts introduced by these draft rules and any other quantitative information they may find necessary to bring to the attention of the Agency. As a balloon owner the introduction of the ARC has done absolutely nothing to improve safety or complaic ewith balloon inspections. It appears to be a piece of paper for the sake of a piece of paper. As mentiojed before, there has been no incident related to poor maintenace of balloons over 35 years so the system owrks. The ARC can bear no relevance to the date of issue of the annual inspection and the dates become confusing. It adds to the cost of ballooning (£80 for issue annually) without any benefit. This additonal burden has deterred poeple from enetering the sport.

response

comment *98* comment by: *Phil Dunnington*

The imposition of Maintenance Programmes and Airworthiness Reviews contributes nothing to safety but adds considerably to barriers to entry and cost of ownership.

response

comment *108* comment by: *Pilot Niels Hvid*

Since all of these systems came into force my early costs has risen by 30% or app. 2000 euro. That is for only 30 flying hours a year, if it is a good year. I am a inspector and soon chief inspector and the rules are to difficult to know, the paperwork are plain stupid in many cases and it brings NOTHING to safety at all. Rather contrary, people will not report things, because it is simply to burdensome. In Denmark must do this kind of work for free, but it will not last long. Many of the old and experienced pilots are not doing inspections any because of the rules and the enormous paperwork. Especially compared to old times. Does it enhance safety that experience leaves the inspector pool ? Not at all! The current level of rules makes entry to the sport almost impossible and people are resigning in a faster pace. We are sending all the experience out the door, while the firm belief is that paper will make up for it. I am so sorry, but paper can not save you people can. Please have this in mind when going through all of the comments. I am an instructor also and I see the deep impact the Part M has done to the sport and I am truly sad.

response

comment *119* comment by: *andrew laing*

A single annual inspection is simple and straightforward. The ARC has done nothing at all for extra safety and simply causes extra work and confusion. as well as cost resulting in acting as a catalyst to people simply giving up ballooning altogether.I come from Scotland where there are few balloons there is a great shortage of inspectors meaninhg we have to drive potentially hundreds of miles fo r this and puts new entrants to the sport off

response

comment *126* comment by: *Andrew DAVIDSON*

A balloon should be inspected annually as has been the case for many years; safety depends upon this!
The issue of an ARC has made no contribution to safety and has placed a burdon of time and cost on my sport.

response

comment *131* comment by: *Richard Gyselynck*

2.3.7 The current Part M bureaucracy has added nothing to flight safety for UK balloons, and presumably across Europe too. It has lead to a reduction in both private and commercial ballooning activity, with a substantial increase in compliance time and cost for owners pilots and inspectors for no discernable benefit. It is noticeable that sales, flying activity, and balloon values have dropped markedly since the arrival of Part M and ballooning is now in decline at a time when other leisure activities (eg motor/water sports) are growing strongly especially among young people.

response

comment *137* comment by: *Carillion*

a simple annual inspection regime with an issued safety certificate is suitable and sufficient for the ballooning industry. in the majority it is a pleasure sport with a considerable expense to enter such an industry (cost of time, money and trouble to get a licence due to lack of commercial interests - you cant just pop to a local airfield and pay for lessons) persons entering this sport are dedicated with their time and respect their equipment wishing to enhance its lifespan as much as is possible - often participating with family and a close network of friends (why would we put these people in danger? training doesnt allow for ignorance of operational missuse - pilots fly safely). This is not a sport that needs to have an increased burden of papework and ongoing costs - this will not increase safety, reduce the likelihood of harm. The ballooning sport is on the decline, paperwork, costs of equipment, theft value of tanks, trailers, lack of secure storage, reduced house/garage size as generations can't finance their own accomodation - all adds to the decline of entrants into the sport.

response

comment *142* comment by: *Derek Maltby*

Since the introduction of the ARC, this has added bureaucracy and paperwork to the previous inspection system which was simple but served its purpose and prevented any equipment related accidents to the best of my knowledge. The annual inspection by a qualified inspector worked well for balloons and would be interested to hear if any safety shortfalls have been discovered by the ARC that would not have been identified by the annual inspection.

The costs associated with the ARC are disproportionate to the safety enhancements it brings and have reduced the number of active pilots in the sport; both those leaving and those not engaged due to the expense.

response

comment *148* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden*

Data on economic impacts: These set of rules will have a great positive effect on the cost of flying, which is, and should be, a top priority right next to flight safety. True cost effectiveness will be achieved as the applicability is raised to include more aircraft. Many operators in the Member States are struggling with fees and charges that are totally suffocating the entire community. EASA can not rule over certain fees but you can help the

community by moving more and more responsibilities from organisations to independent certifying staff, thus reducing the requirements for expensive certificates/licenses and approvals from the competent authority.

With Light Part-M, we have already made progress in this matter but it is important that we keep on examining if there are more we can do. By authorizing certifying staff to do Airworthiness reviews up to **ELA2** we have achieved a lot in that aspect.

Conclusion: In order to lower the cost of flying, we must reduce the number of hoops that the aircraft owners/operators have to jump through. Every hoop cost a lot of euros so therefore consequences are severe every time a hoop is created or not removed when can be.

response

comment *153* comment by: *Ian HEY*

The main benefit for the UK gliding movement will be the removal of the requirement for a CAMO, together with all associated, including regulatory, charges.

response

comment *161* comment by: *DE LOOF JEAN PIERRE*

Ther is no significant higher utilisation of gliders expected with part ML implementation.

response

comment *209* comment by: *Allie Dunnington*

comment for 2.3.7:

Over the last year I have personally observed my husband doing inspections just the same way as he has done for nearly 30 years of his inspector/pilot/examiner life but the work load with paperwork has increased at least 3 times - adding absolutely nothing to the safety of the particualar balloon inspected as the field inspection still would only take about 1 to 2 hours but the time spent browsing websites and looking up irrelevant figures and writing ARCs that have no meaning, is now taking at least 4-5 hours.

This additional time spent by the inspector has to be passed down in terms of costs to the pilots who hardly can afford the old rates never mind twice the money that inspectors reasonable would have to charge doing all the current paperwork required under Part M. Many young pilots can hardly afford the basic costs of ballooning, paying for their training, gas, insurance, balloon depreciation but if the annual inspection becomes yet another burden, many will and have to give up. A very sad development for this wonderful activity that stimulates so much public interest!

response

comment *222* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016*

	An economic impact is to skip all the EASA rules. Only the maintenence manuals of an aircraft are the rules. The certyfiing staff can signed this. No more actions are necessary for an airwothiness aircraft. E. g. a 100h-inspection (without any big problems) needs about one working day, 8h. This includes the sign of the aircraft checklist. And this is what a customer will pay. Your rules need additional one working day, 8h, for documentations. This is what the the customes doesn't pay.
response	

comment	*229* comment by: *CAA-NL* **Question 3 Additional Data or quantitative information** Although CAA-NL does not have factual data, CAA-NL questions the effect of the proposed maintenance alleviations on the cost of ownership. The NPA does not provide substantiation to what extent the cost of ownership depends on the maintenance (direct maintenance cost) as a percentage of the total operating cost. Also, a lower maintenance standard will result in a lower market value and thus requires a depreciation of the aircraft effecting the residual value. In addition, when an owner spend less money by maintaining the aircraft at a lower standard, there is no guarantee that the owner will use that money to spend on more flying. (Although the current fuel prices might also be a relieve). And what is the effect of the (possible higher) insurance rates imposed by insurance companies? Before the introduction of Part M in the Netherlands approved maintenance organisations were able to perform the maintenance management for owners of aircraft and perform the CofA renewal inspection. To be able to provide the same service for their customers under the new system they invested in a CAMO approval. Now 10 years later with the proposed rules they are back in the old situation wondering why all these efforts and investments were necessary.
response	

comment	*301* comment by: *Jos TREHERN* **Re: Stakeholders are kindly invited to provide data on economic impacts introduced by these draft rules and any other quantitative information they may find necessary to bring to the attention of the Agency.** Compared to a simple, single annual inspection the current Part M system for balloons is complex, confusing and expensive, whilst at the same time doing nothing to improve safety. I believe the costs of ARC's and inspections have contributed to pilots leaving ballooning and that it is also a barrier to people wishing to join the sport. In my experience the Part M system has resulted in costs increasing by over 100% for private balloonists. Furthermore, for my area alone the level of pilot attrition is over 10% with virtually no new people coming into the sport.
response	

comment *320* comment by: *The Norwegian Air Sports Federation*

2.3.7
NLF supports the alleviations linked to maintenance programmes, airworthiness reviews and deferment of defects.

NLF supports the guidance on TBO extensions, as we believe it makes the owner more aware of elements increasing or reducing risks relevant to judge whether a TBO extension is a viable choice.

With regard to NAAs and CAMOs, we fear that – despite the guidance – these bodies have very few, if any, incentives to approve a maintenance program with TBO extensions other than those always having been practiced in the relevant territory (which differ greatly from state to state in Europe). Approving extensions increases the risk for the NAA/CAMO, while they have no benefits in agreeing to them. With the option of a self-declared programme, the NAA/CAMO has a different path to encourage the aircraft owner to utilise. This will in our opinion be the core solution for aircraft owners wanting to run components beyond TBO.

Bearing this in mind, one particular part of the draft regulation should be re-considered. The problem can be found both in regulation (EU) 2015/1088 as well as in NPA 2015-08, as follows:

"M.A.302 (h) (5):
If the review shows discrepancies on the aircraft linked to deficiencies in the content of the maintenance programme, the person performing the review shall inform the competent authority of the Member State of registry and the owner shall amend the maintenance programme as agreed with such competent authority."

"ML.A.302 (7):

If the review shows discrepancies on the aircraft linked to deficiencies in the content of the AMP, the AMP shall be amended accordingly. The person performing the review shall inform the competent authority of the Member State of Registry in those cases where he/she does not agree with the measures taken by the owner in order to amend the AMP."

The draft regulation is slightly better than the current regulation as implemented 2015/1088, but still there is a risk that the authority will enforce TBO compliance on a potentially random assumption (or worse: a hidden agenda) by the airworthiness review staff (ARS). Taking into account that the maintenance facility is likely to do the review to reduce practical and financial burden for the aircraft owner – and keeping in mind that maintenance facilities have a financial benefit in enforcing TBO recommendations from the DAH, while CAMOs have a risk-reducing incentive to do the same – the competent authority may be ill advised by "the person performing the review" on this particular subject.

The term "discrepancies" in the first sentence makes this even more likely to be a problem: What is actually a "discrepancy"?

To solve these problems, NLF would like to suggest rewording **ML.A.302 (7)** as follows:

"If the review shows defects on the aircraft seriously affecting its airworthiness, which is

clearly linked to deficiencies in the content of the AMP, the owner shall amend the AMP accordingly. In those cases where the person performing the review does not agree with the measures taken by the owner in order to amend the AMP, the owner shall be invited to have the AMP reviewed a second time by a different person. If the second review leads to the same conclusion, the person performing the initial review shall inform the competent authority of the Member State of Registry."

response

comment *342* comment by: *Howard Torode*

Comment by European Gliding Union

Request for comment on economic impact of these draft rules.

While PML is a step in the right direction, as currently formulated, it is difficult to assess its likely impact in 27 different nations.

The EGU Board considers that the actual measures of PML will serve to broaden the scope of those authorised to carry out specific functions of maintenance organisation and CAMO. However these measures will require significant changes to working practices, in addition to those already being implemented under concurrent adjustments (especially EC1088/2015 and Part 66). This patchwork of detailed changes can only be fully understood by cross reference to Part M itself, plus the other rules already noted, making the appreciation and understanding of this measure very complicated, and the impact on the need for other approvals unclear. The ultimate penalty for this is non-optimum economy of service.

From the point of view of any approved organisation, PML will precipitate a much deeper review of their practices, and agreements with their respective NAA than these simple measures might suggest. There will need to be reviews of approval statuses, for relevance and added value. It is unfortunate that a wider review has not considered the whole issue of approvals for organisations involved in, or serving, sport aviation, as a possible application of proportionate regulation. A single, across the board, statement of overarching regulation enabling more local interpretaiton of detailed requirements would have been more welcome.

From the point of view of owner/operators, these rules will undoubtedly broaden their choice of options. however even in this area, economic and safe progress will only be secured if the rule is published in a concise, free standing form.

response

comment *356* comment by: *Kevin Meehan*

ref section 2.3.7

For the past 30 years, I have inspected and maintained approximately 500 hot air balloons. The recent introduction of ARC's and associated unecessaary paperwork, has contributed additional unecessary costs and has not contributed to a "safer" aircraft. The complex

	proposals in PART ML will only add to the already bureacratic procedures and will not contribute to a more airworthy or safer aircraft - but will add to the costs of maintaining a simple aircraft. This will have an adverse effect on the sport of ballooning.
response	

comment	*417* comment by: *Cameron Balloons Ltd* The current system does nothing to improve safety, it takes longer to complete all the paperwork and the inspectors are having to charge for this. These extra costs are putting off new people coming into this form of avaition and are driving existing members of this field out.
response	

comment	*447* comment by: *flyingadverts* The current Part M system does nothing to improve safety, and infact may be a detriment to safety. This has led to a decline in the industry, over burden on pilots, lack of recency, and no benefits and completely out of proportion. This has probably led to an increase of accidents rather than a reduction
response	

comment	*456* comment by: *Chris Davies* As the owner of 5 balloons that I fly privately the cost of maintenance programs and ARCs that do not make balloons safer cost 40% of the annual operating budget
response	

comment	*534* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland* Attachment #4 Please find enclosed a list of aircraft/engines to be withdrawn from service after a special inspection has been conducted in order to receive DAH's recommendation alleviations (TBO extensions) according FOCA's policy (see also explanation under 2.3.1, number 3 below, Annex 2).
response	

comment	*565* comment by: *Colin Wolstenholme* ref 2.3.7 economic impacts Since the introduction of this Part M system, there is more time spent in paperwork than in actually looking at the balloon (aircraft) Much of the paperwork is repetitive and does nothing to add to the safety of hte aircraft.

response

comment *603* comment by: *René Meier, Europe Air Sports*

Page 11
Remark:
Statistics deal with the past, this here is about the future. No statistics are needed to demonstrate how sports and recreational aviation declined. Looking at one competent authority: The number of staff increased from less than 180 to considerably more than 300, but our activities did not increase as much, on the contrary…

Rationale:
Some declined, by approximately one third. And staff at competent authorities increased, by one third approximately (see also "Parkinson's Law" for further guidance, where you will find that an organisation, not at war, will grow annually by 5.17 to 6.56 percent, independently of the amount of work to be done, if any). In five years from now we shall have to look at the statistic.

response

comment *699* comment by: *European Sailplane Manufacturers*

The manufacturers see here mostly a benefit on the economical side of the owners, but this is considered by the manufacturers as beneficial to the whole community.

A much more restrictive regulation might enforce much more business for maintenance and CAMO organisations but experience shows that then the owners might decide in the long run to cut costs by reducing flying or even to quit totally flying.
Both is not of benefit to anyone.

Typically the owners will over their time spent in aviation tend toward larger and more complicated aircraft types (even within gliding) and will have in parallel less time to conduct maintenance task on their own or in the club.

This will create more and sufficient economical chances for the maintenance and CAMO organisations even without rules forcing the owners to go directly to these organisations.

Therefore making life easier for the owner is in the end of economical benefit for the whole community.

response

comment *718* comment by: *Quality Manager Easy Balloons Ltd*

Stakeholders are kindly invited to provide data on economic impacts introduced by these draft rules and any other quantitative information they may find necessary to bring to the attention of the Agency.

Firstly I find the use of the term 'Stakeholder' by EASA rude. We are not stakeholders we are

Customers. The way in which the current system in the UK is funded means that the burden of cost to operate as a Part M Organisation is passed to the customer. Any changes are unlikely to reduce the cost to the balloonist unless the costs to the Holder charged by the various NAAs is reduced.

response

2. Explanatory Note — 2.4. Overview of the proposed amendments p. 11-13

comment *3* comment by: *Guillaume SUDRE*

Few comments :

- *"The proposed amendments have been developed taking into account the limitations imposed by the Basic Regulation, such as: — the need to have maintenance performed at an approved maintenance organisation ...."*
  As of today, most of the maintenance for ELA2 (except complex maintenance tasks) can be performed by independent certifying staff.

- Regarding the need of an ARC document.
  In the case of an ELA2 aircraft maintained by an independent certifying staff, the airworthiness review doesn't necessarily coincide with a 100H/annual or any other maintenance.
  It would be highly restrictive to mandate annual maintenance and the airworthiness review

- The CRS does not have a standardised format
  Provide a standardised CRS format for independent certifying staff and maintenance organisation (not too big so that it could fit the aircraft logbbok).

response

comment *21* comment by: *CAMO Support Ireland*

2.4 (page 12) ELIMINATION OF THE ARC AND REPLACE IT WITH A STATEMENT IN THE CRS:
I don't believe this of any significant benefit. The "review process" to allow for the issue of the ARC is the time consuming part of the exercise.
The generation of the Form 15 is really the easiest part of the exercise.

response

comment *22* comment by: *CAMO Support Ireland*

2.4 (page13) ELIMINATE THE NEED FOR AN ORGANISATION MANAGING THE CONTINUING AIRWORTHINESS OF AIRCRAFT INVOLVED IN COMMERCIAL OPERATIONS (CAMO)
Is the agency talking about those types of operations as noted in M.A.201 (i)? ie. Commercial flying schools, Aerial work operations etc?

	If that is the case I assume each commercial operator still has the choice to opt in (or out) of the CAMO system, Perhaps this should be clarified here.
response	

comment	*35* comment by: *BBAC British Balloon and Airship Club (UK)* — the need to maintain the aircraft in accordance with a maintenance programme; BBAC: BR Annex IV, para 6 (a) (iv) says that "the maintenance of the aircraft is performed in accordance with its maintenance programme" this does not rule out the maintenance programme for a balloon being part of the manufacturer's (DAH's) manual, rather than a separate document. A more enabling interpretation of the BRs is required as per Mr Ky.
response	

comment	*36* comment by: *BBAC British Balloon and Airship Club (UK)* Certainly, it could have been possible, as requested by some members of the Task Force, to eliminate the ARC and document the airworthiness review by adding a statement to the Certificate of Release to Service (CRS) issued for the 100 h/annual inspection. However, the Agency believes that this could potentially create problems when the documents are reviewed by the competent authority for the purpose of accepting the transfer of the aircraft from another Member State, for the following reasons: BBAC: Thank you for confirming the ARC can be eliminated.
response	

comment	*37* comment by: *BBAC British Balloon and Airship Club (UK)* Certainly, it could have been possible, as requested by some members of the Task Force, to eliminate the ARC and document the airworthiness review by adding a statement to the Certificate of Release to Service (CRS) issued for the 100 h/annual inspection. However, the Agency believes that this could potentially create problems when the documents are reviewed by the competent authority for the purpose of accepting the transfer of the aircraft from another Member State, for the following reasons: BBAC: Your only justification to retain the ARC (for balloons) to assist inter-state transfers is absurd. There are so very few such transfers for balloons compared to the number of annual inspections and unnecessary ARCs that you cannot make an argument here based on any cost-benefit analysis. You are penalising balloon owners without any real justification.
response	

comment	*38* comment by: *BBAC British Balloon and Airship Club (UK)* — The CRS does not have a standardised format (sometimes it is just a signature in the logbook, other times it is a separate document with no predefined format). BBAC: Not seen as any problem in ballooning. An inspector is a professional who can ensure no ambiguity.
response	

comment	*39* comment by: *BBAC British Balloon and Airship Club (UK)* — There could be cases where the 100 h/annual inspection is not performed together with an airworthiness review; for instance in the case of aircraft with high utilisation (more than 100 h per year). BBAC: Not seen as any problem in ballooning. An inspector is a professional who can ensure no ambiguity.
response	

comment	*40* comment by: *BBAC British Balloon and Airship Club (UK)* All this could raise questions as to whether a particular CRS statement includes the airworthiness review or not. BBAC: Not seen as any problem in ballooning. An inspector is a professional who can ensure no ambiguity.
response	

comment	*41* comment by: *BBAC British Balloon and Airship Club (UK)* **In addition, the Agency is interested in receiving specific feedback on the following proposals:** 1. Eliminate the ARC and replace it by an additional statement included in the CRS of the 100h/annual inspection. BBAC: Elimination of the ARC and replacement by an additional statement on the CRS for the annual inspection is the most important missing element between the proposal and a true "Light" Part M for balloons. EASA has clearly confirmed in the text as written that there is no obstacle in the Basic Regulations to eliminate the ARC. Elimination of the ARC for balloons would hugely reduce the workload for maintenance / certifying staff and the associated costs which always finally fall on owner/operators. These costs for bureaucracy with no safety benefit are a major factor which is suffocating the ballooning sector of general aviation. We submit again, unequivocally, that the ARC adds no value for balloons as a separate document and that ARCs should be eliminated for all balloons. It would not be a difficult matter to ensure the CRS for annual / 100h inspections is suitably formatted so that the airworthiness review activity is evident. Certainly, the feeble justification offered that the ARC is needed to facilitate (the very occasional instances of) inter-state transfers of balloons should be rejected vigorously on the grounds of proportionality; for every inter-state transfer that

might be slightly more complex without an ARC, there are hundreds of annual inspections with unnecessary ARCs issued at present.

response

comment *42* comment by: *BBAC British Balloon and Airship Club (UK)*

2. The need to amend the Basic Regulation in order to:
— eliminate the need for a maintenance programme;— include certain categories of balloons (and maybe other aircraft) in Annex II of the Basic Regulation; and — eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations (this organisation, in the Implementing Rules, is called CAMO).

BBAC: Changes to the Basic Regulations should be sought without inertia. As stated, for simple aircraft such as balloons individual maintenance programmes add nothing to safety; they are only a bureaucratic cost which simply calls up the manufacturer's documentation. In a separate "Part Balloons" it should be clearly stated that the manufacturer's documentation should have the force of the AMP without any need for additional documents.

response

comment *43* comment by: *BBAC British Balloon and Airship Club (UK)*

2. The need to amend the Basic Regulation in order to:
— eliminate the need for a maintenance programme;— include certain categories of balloons (and maybe other aircraft) in Annex II of the Basic Regulation; and — eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations (this organisation, in the Implementing Rules, is called CAMO).

BBAC: BR Annex IV, para 6 (a) (iv) says that "the maintenance of the aircraft is performed in accordance with its maintenance programme" this does not rule out the maintenance programme for a balloon being part of the manufacturer's (DAH's) manual, rather than a separate document. A more enabling interpretation of the BRs is required as per Mr Ky.

response

comment *44* comment by: *BBAC British Balloon and Airship Club (UK)*

2. The need to amend the Basic Regulation in order to:
— eliminate the need for a maintenance programme;— include certain categories of balloons (and maybe other aircraft) in Annex II of the Basic Regulation; and — eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations (this organisation, in the Implementing Rules, is called CAMO).

BBAC: Balloons should not in any form come under CAT (this is not a discussion for the Part ML NPA). Whether "commercial" ballooning is covered under SPO or CAT, there is no need for continuing airworthiness to be managed by a CAMO, due to the simplicity of the aircraft. This task is readily performed by the owner/operator, who may choose (but should not be obliged) to contract an independent certifying staff or a MO or a CAMO.

response

comment *45* comment by: *BBAC British Balloon and Airship Club (UK)*

2. The need to amend the Basic Regulation in order to:
— eliminate the need for a maintenance programme;— include certain categories of balloons (and maybe other aircraft) in Annex II of the Basic Regulation; and — eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations (this organisation, in the Implementing Rules, is called CAMO).

BBAC: We aim for regulation under Part ML (or Part Balloons) which is sufficiently "light" that there is no incentive to move series balloons to Annex II. We note that the benefit of being an EASA aircraft (Annex I) is of particular use to balloons, given the tendency for pilots to take their balloons to other countries for balloon festivals etc.

response

comment *60* comment by: *BUHABS (Bristol University Hot Air Ballooning Society, UK)*

You asked for comments on eliminating the ARC.
As a sport ballooning club we are 100% in favour to eliminate the ARC and all bureaucracy and costs. We had no issues in the 20 years we operated before ARCs were required. Please consider looking at the specific needs of ballooning, with such simple aircraft. We don't comment on what might be right for fixed wing but we don't expect to be burdened with rules only useful for fixed wing. We expect you can write things nicely with "except for balloons" as necessary.

response

comment *61* comment by: *BUHABS (Bristol University Hot Air Ballooning Society, UK)*

You asked for comments on eliminating the maintenance programme. As a sport ballooning club, we can tell you our balloon's MP adds no value. it simply tells us to read the Cameron Balloons manuals, which we do. The MP is unnecessary paperwork which no one really understands except the inspectors. You should change the rules for that a generic MP covers all balloons. We heard that the Basic Regulations only say a MP must be used, not that it must be specific for every balloon. All balloons have the same MP in practice, you could write the rules to make this official.

response

comment *63* comment by: *BBAC British Balloon and Airship Club (UK)*

— the need to have an organisation responsible for the continuing airworthiness management in the case of commercial operations;

BBAC: Balloons should not in any form come under CAT (this is not a discussion for the Part ML NPA). Whether "commercial" ballooning is covered under SPO or CAT, there is no need for continuing airworthiness to be managed by a CAMO, due to the simplicity of the aircraft.

	This task is readily performed by the owner/operator, who may choose (but should not be obliged) to contract an independent certifying staff or a MO or a CAMO
response	

comment	*71* comment by: *Richard ALLEN* "1. Eliminate the ARC and replace it..." - It is good to see that EASA note that the ARC could be abolished for balloons. This would be a significant improvement to the current situation, and would remove a paperwork burden from ballooning, as well as reducing costs. A statement on the CRS should be sufficient to replace this. Continuing to have an ARC required for balloons solely in case that balloon is transferred to another country would be excessive and unnecessary, as the vast majority of balloons remain in the initial country of registration. (To cater for this, a specific "Transfer" form could be made available on the NAA website of each country, which a registered inspector could fill out prior to a balloon being transferred to another country.)
response	

comment	*72* comment by: *Richard ALLEN* "2. The need to amend the Basic Regulation in order to: eliminate the need for a maintenance programme" - in the case of balloons, maintenance programmes are not required as separate documents as all required information is included in the manufacturers' manuals. Again, as per the ARC, maintenance programmes confuse most balloon owners and pilots. Due to the simple nature of a balloon, maintenance programmes are not required.
response	

comment	*73* comment by: *Richard ALLEN* "2. The need to amend the Basic Regulation in order to: - eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commerical operations" - for commercial balloon operations a CAMO should not be a requirement. It adds unnecessary cost and bureaucracy, and does not add any safety benefit to an operation.
response	

comment	*78* comment by: *Richard Nash* It would be good to eliminate the ARC as it is inappropriate to the operation of balloons. I support the proposal to replace it with a statement on the CRS. Maintenance requirements are adequately dealt with in balloon manufacturers' manuals so there is no need for separate Maintenance Programmes.
response	

comment	*79* comment by: *Richard Nash* The requirement for a CAMO for commercial balloon operators does nothing to improve safety but adds unecessary costs. This requirement should be removed.
response	

comment	*89* comment by: *Preece* ARC / CRS I seem to be on a fixed theme here. As far as balloons are concerned, ARC is just a paperwork exercise which offers no advantage to anyone. A simple "Release to Service" or annual inpaction-pass is all thats required. Given the simplicity of balloons, a "pass" in one country should be accepted by all of them Eliminate the ARC ! Good idea ! it just adds to cost, not to safety. No need to keep it or have one to re-register a balloon in another country. Im sure the other light aircraft types would benefit from a similar approach.
response	

comment	*93* comment by: *Medical Officer BBAC* In addition, the Agency is interested in receiving specific feedback on the following proposals: 1. Eliminate the ARC and replace it by an additional statement included in the CRS of the 100h/annual inspection. The ARC adds nothing to safety and is another regulation imposed on ballooning without any evidence base to its abiltiy to improve safety. There are associated bureaucracy and costs for an unnecessary process (ARCs). I agree with EASA that the ARC could be abolished and it should not be retained just for convenience in case a balloon is re-registered in another country.
response	

comment	*94* comment by: *Medical Officer BBAC* 2. The need to amend the Basic Regulation in order to: — eliminate the need for a maintenance programme: Referring to point 2, page 13 the present maintenance programme should be abolished for ballooning as it does nothing to improve saftey and just adds to the cost and bureacracy of ballooning deterring poeple from entering th sport. The previous sytem worked and was far less compex.
response	

comment | *95* comment by: *Medical Officer BBAC*

2.The need to amend the Basic Regulation in order to:
— eliminate the need for a maintenance programme;— include certain categories of balloons (and may be other aircraft) in Annex II of the Basic Regulation; and
— eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations
CAMOs should not be a requirement for commercial balloon operations, since all balloons are very simple aircraft and there is no demonstrated safety benefit. CAMOs just add costs and bureaucracy.

response |

comment | *99* comment by: *Phil Dunnington*

Confirming my belief that the existence of an ARC adds nothing to safety. A simple addition to the CRS confirming that Airworthiness Review has taken place should be sufficient. ARCs are a disproportionate and unnecessary carry-over from 'big aeroplane' mentality. The CRS could indeed have a standard format, and it should be remembered that the number of airworthiness issues affecting balloons is very limited and usually advisory rather than mandatory. So few balloons are transferred between registries that any (slight) inconvenience in these cases imposed by an Airworthiness Review on transfer is far outweighed by the inconvenience and cost of an annual ARC.
I there foresupport Option 1 wholeheartedly.

As for Option 2, it is not clear to me that the Basic Regulation requires a Maintenance Programme other than that supplied by the OEM in their Maintenance Manual. Whilst the ability to develop an independent Programme should not be precluded, it should certainly not be mandatory.

The distinction between maintenance procedures according to 'purpose of flight' should be eliminated. Balloons are so technically simple that neither their construction not their maintenance suggests any need for such differentiation. A CAMO structure, whilst remaining an option, should not be mandatory for balloons in commercial use as it offers no measurable improvement of safety margins.

response |

comment | *109* comment by: *Pilot Niels Hvid*

The ARC brings no value to safety and airworthiness what so ever. It an regulation you have blindly copied and without any thought. The need for such a thing is not necessary. Do not continue with using the ARC for convinience reasons, kill it.:)

response |

comment | *110* comment by: *Pilot Niels Hvid*

The whole idea of the maintenance program does not add value. All manufacturers has a maintenance shcedule that are to be followed any way and this is included in the maintenance program. So you just add additional paper on top of papers. Ballon operators

does not understand and many of the things we are signing for as inspectors are so logic and natural that it is not necessary at all. Following and compliyng to the manufacturers guidelines has always and is today the case. Balloons are so simple, that they do not need maintenance programs at all. In Denmark normal flying time a year is 15-30 hours. So deeply unneccessary.

response

comment *111* comment by: *Pilot Niels Hvid*

CAMO should not be a necessary thing for holding AOC. CAMOs in our ballooning company adds no value, just triple the cost of normal private operation. Balloons are simple and the Operation and Maintenance manuals, required for having a ballooning company is more then sufficient. You do not need an organisation to oversee your business.

response

comment *113* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden*

Removal of ARC: AOPA supports a further discussion on removal of the ARC since this is a bureaucratic product which has not contributed to a higher level of safety in the GA community(please prove us wrong). The concern of a higher complexity when aircraft are transferred between states are a minor problem and should not be seen as a reason enough to not examine this option.

Removing the ARC is a good way to reduce the cost of flying with very little(if any) effect on flight safety. If the argument of aircraft transfer is the reason for holding it back, the Agency should start with the process of removal as soon as possible. The benefit of removing it is just too great to not investigate it further.

The arguments about the CRS and the mismatch of 100h and annual is a minor issue and it can be up to the owner/certifying staff to deal with. The certifying staff is a professional.

response

comment *120* comment by: *andrew laing*

The ARC has achieved nothing except extra complication and expense from the world of aircraft . Tthere has been no change in overall safety at all - we should replace it with statement in the CRS certificate .There are a tiny number of balloons which move from one country to another and this alone is a poor reason for adding to the inspection regime under the ARC which should be abolished .

response

comment *121* comment by: *andrew laing*

A maintenace programme is not needed . The manufacturesrs manual is comprehensive and easily understood . there are very few moving parts in a balloon and the level of maintenacen is enormously different to an aircraft and really cant be compared at all. I even

	think matters would be improved without a programme because pilots take a personal interest in maintenace rather than leaving it to another party and the pilot will always take care of their balloon best- after all they have the greatest interest in its maintenance !
response	

comment	*127* comment by: *Andrew DAVIDSON* I support the elimination of the ARC and replace it with a statement on the certificate of release to service issued at the time of the periodic inspection of the balloon (Annual inspection, IR7)
response	

comment	*128* comment by: *Andrew DAVIDSON* I agree with the second statement, need to amend basic regulation to eliminate need for a maintenance programme. We have manuals from Camerons for this.
response	

comment	*132* comment by: *Richard Gyselynck* Feedback on ARC: In the UK before Part M, a CRS was sufficient to establish the airworthiness of a balloon. The ARC process has added nothing to flight or engineering safety for balloons and should be dropped. Retaining the ARC in case of re-registration of a balloon in another country is not enough justification for imposing this burden on the large majority of balloons that never transfer to another register. Bring back the CRS please!
response	

comment	*133* comment by: *Richard Gyselynck* Feedback on Elimination of Maintenance Programmes: These are not required or appropriate for balloons, as the Maintenance Manuals supplied by balloon manufacturers have been proved to be comprehensive and effective. Don't re-invent the wheel - Michelin know how to maintain tyres and Cameron/Schroder/Ultramagic?Kubichk know how to maintain their balloons!
response	

comment	*134* comment by: *Richard Gyselynck* Feedback on CAMOs: CAMOs should not be a requirement for simple aircraft such as balloons, even when they are operated commercially. There is no demonstrated benefit to safety, just extra administrative time and cost.
response	

comment	*138* comment by: *Carillion*

	the ARC is effectively a burden created for aircraft and does not apply to ballooning. this imposition and is additional paperwork and bureaucracy doesnt increase safety of balloons. Do not make the sale/movement of balloons from country to country more difficult and expensive.
response	

comment	*139* comment by: *Carillion* A maintenance programme sould be eliminated, this is not needed for balloons. Balloons should have a simplified process - manufacturers manuals are suitable and sufficient for maintaining the safety of lighter than air flight. Most balloon pilots don't partake in maintenance training programmes, whcih would increase the burden and cost of the sport, having to engage more assistance to adher to a new programe
response	

comment	*143* comment by: *Derek Maltby* It is good that the EASA is questioning the value of the ARC and indicates that it is listening to those affected by its bureaucracy and lack of genuine quantifiable cost/benefits. The elimination of the ARC should be applauded and a simple 'certificate of release to service' form adopted instead. The burden the ARC places on balloonists, operators and owners is disproportionate to any safety enhancements identified and delivered. The ARC should not be retained for convenience 'just in case' the balloon is re-registered in another country.
response	

comment	*144* comment by: *Derek Maltby* The Maintenance Programme is not necessary. A simple maintneace system for balloons is sufficient using the manufacturer's maintenance manual. It is not necessary for pilots to understand the maintenance programmes.
response	

comment	*154* comment by: *Ian HEY* It would be beneficial to amend the Basic Regulation to eliminate the need for an ARC for ELA aircraft. All engineering checks in the ARC are included in a properly executed Annual check. 1 Elimination of the ARC is supported. The engineering actions therein must be contained within a minimum maintenance programme, therefore no change to the 100hr/Annual check CRS wording is required. 2 A maintenance programme for each aircraft must be maintained. Within the UK generic maintenance programmes already exist for gliders (BGA GMP) and light aircraft (CAA CAP

766).
All gliders and self sustaining gliders should be Annex II, in addition to certain categories of balloons.
Commercial operations should not require a CAMO.

response

comment *162* comment by: *DE LOOF JEAN PIERRE*

1- Replace ARC by an additionnal statement included in the CRS of the 100H/anual inspection seems sensible as the release of the aircraft an the airworthiness review would be achieved at the same time by the same person.
2.A customised maintenance programme is not necessary.
Each aircraft owner has the manufacturer maintance manual and the customised AMP is jus a inference of it. It the same for maintenance manual of equipements manufactuers.
Just ensure that the manufacturer maintance manual is up to to date. Then adding a file with components and equipements specific to the aircraft is sufficient to conduct the maintenance. AD review being an obligation anyway.
If an AMP is requested , how will be managed this AMP ? how would competent authorities take care of it ?

response

comment *166* comment by: *DE LOOF JEAN PIERRE*

ARC renewal should be only annual. In good weather conditions and specialy training, gliders may fly 300 hours a year (even more in southern Europe). It is not sensible to impose and ARC renewal at each 100 H visit, as it seems requested in this NPA.

response

comment *172* comment by: *Merlin Balloons*

Elimination of the ARCs is most welcome as applying for ARCs (and issuing ARCs) only costs money and time, even though it adds nothing to safety! ARCs are a burden to balloon owners and we strongly feel that their replacement with a simple statement on the balloon's certificate of release to service would be satisfactory. Keeping the ARCs would not be justified by the fact that in the rear occasion of the balloon being relocated to another country the process would be slightly more complex.

response

comment *173* comment by: *Merlin Balloons*

Maintenance programmes are not understood by many pilots and balloon owners. We would like to see the simplification of maintenance programmes for balloons and we feel that manufacturers' maintenance manuals are sufficient enough, without the need for a separate document for this.

response

comment	*174* comment by: *Merlin Balloons* It would also be welcoming news for commercial balloon operators if the need for CAMO in commercial operations was eliminated. Just like in the cars of ARCs, CAMOs only cost time and money without additional safety value.
response	

comment	*210* comment by: *Allie Dunnington* I strongly propose - as already mentioned in point 1 - to eliminate the requirement for ARCs as in my opinion they don't add anything to the safety and well-functioning of a balloon. ARCs should be replaced by simple statements on the CRS form. The argument for keeping ARCs just in the rare occasion of shifting balloons between one country to another isn't worth the hassle, money and effort for 99% of balloons that remain within one country.
response	

comment	*211* comment by: *Allie Dunnington* comment to page 12: I have to refer back to point 2, page 13 and reiterate what I have already said there: most balloon owners don't understand and cannot afford the money and time required if there had to follow MPs. Manufacturers flight manuals are perfectly adequate for balloons as they consist mostly of parts that are produced and kept within oversight of that manufacturer.
response	

comment	*212* comment by: *Allie Dunnington* page 11-13: CAMO's don't improve or enhance the standards of inspections and maintenance programmes of balloons whether for private nor commercial balloons. They are only adding more costs and bureaucracy. Instead of an inspector doing an one hour physical inspection in the field checking every part of the balloon in detail, the inspector now has to spend 5 hours sitting infront of a computer filling in useless webpages. It would be much better for the inspector to have more time in the field to do his/her work thoroughly instead of worrying about the time being paid for running out and therefore rushing the actual physical inspection. Balloons are very simple aircraft and there is just no need for a CAMO.
response	

comment	*230* comment by: *CAA-NL* **Question 4 Comments on the vision of the members of the task force.** CAA-NL does not support to eliminate the ARC as it is now well adopted in the aviation system. CAA-NL proposes that for ELA2 aircraft every three years a full airworthiness review is performed by an authorized airworthiness review staff (either CAA, CAMO+ or Certifying Staff authorized by CAA). In between, the annual inspection program is carried out and

released to service as maintenance by Part-66 Certifying Staff.
CAA-NL does not support the option to eliminate a maintenance program. For ELA2 aircraft, a maintenance program can range from a short list of tasks, interval and their next due. An owner shall show compliance with the AD's and AWL's, so keeping a list of repetitive tasks is not an heavy burden.
Certain additional categories in Annex II (e.g. balloons): than those aircraft have to be dealt on a national level which may not lead to reciprocal acceptance of airworthiness certificates. With several balloon festivals in EU where many operators from other countries are joining, this is not a step forward in open borders but a step back.
Eliminating CAMO for ELA2 aircraft used in commercial operations. Well, the scope of CAW tasks for such aircraft are must lower and require less complex systems and less personnel competence. Granting maintenance organizations such CAMO privileges might be a consideration. The maintenance organizations offered such services in the past in addition to performing maintenance.

response

comment *306* comment by: *Jos TREHERN*

Re: In addition the Agency is interested in receiving specific feedback on the following proposals:
1. Eliminate the ARC and replace it by an additional statement included in the CRS of the 100h/annual inspection

EASA are to be congratulated for confirming the ARC could be abolished. In a ballooning context the ARC adds nothing to safety but imposes an aircraft regulation, along with associated bureaucracy and costs, that does not accept unnecessary processes (ARCs) for 99% of inspections just in case there is greater complexity in moving a balloon from one country to another. The ARC should be abolished and not retained as a convenience in case a balloon is moved to another country.

response

comment *307* comment by: *Jos TREHERN*

Re: In addition, the Agency is interested in receiving specific feedback on the following proposals:
2. The need to amend the Basic Regulation in order to:
- eliminate the need for a maintenance programme

This simplification for balloons is supported. Because balloon manufacturer's manuals are fully sufficient there is no requirement for Maintenance Programmes as separate documents. Furthermore, most balloon owners and pilots do not fully understand maintenance programmes.

response

comment *308* comment by: *Jos TREHERN*

Re: In addition, the Agency is interested in receiving specific feedback on the following proposals:

2. The need to amend the Basic Regulation in order to:
- eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations (this organisation, in the Implementing Rules, is called CAMO)

Commercial balloon operations should not require a CAMO as all balloons are very simple aircraft and there has been no demonstrated safety benefit. CAMOs just increase bureaucracy and costs.

response

comment *319* comment by: *The Norwegian Air Sports Federation*

While we agree that the current basic regulation has quite a few limitations, we do not believe that the concept of a maintenance programme should be ommitted in the future. On the contrary, a well thought out maintenance programme can be a key both to ensure safety and to keep costs down. The reason for the resistance towards maintenance programmes in the past in the GA community is the way Part-M was originally implemented. It does not necessarily mean that the concept of maintenance programmes is flawed.

We see the following benefits with maintenance programmes:

1) All maintenance documents are defined in one single document by references to manuals and editions/revisions. In the past, the aircraft owner typically relied on the maintenance organisation to keep full track of all the maintenance documents required to service an aircraft. The consequence was often old revision manuals being used, missing SBs, maintenance done without access to a certain sub-component manual, etc. With an AMP, all information can be found and updated in one spot.

2) Flying components past TBO – and indeed deviating from any DAH recommendation – can only be done if the owner is aware of what he/she is deviating from and what compensating measure is applied. As long as the owner is responsible for the airworthiness, only the owner can do a final risk assessment and judgement in this regard. Without an AMP, where can the owner collect all data about these issues? And how can he/she document deviations and practices, critically needed when the aircraft changes hands during a sale etc.?

3) The signature of responsibility in the AMP makes the owner much better aware about the decisions made than if maintenance instructions are being handed over to the maintenance facility verbally or in an e-mail, etc.

4) An AMP makes maintenance simpler for the mechanic: All information is collected in one spot, even maintenance tasks following regulatort requirements, types of operation, etc (which may be impossible to find in the DAH manuals). The mechanic can concentrate on maintenance tasks instead of paper work.

In short: NLF strongly supports the concept of AMPs, as long as they can be simple, composed by the owner and declared by the owner.

response

comment *322* comment by: *The Norwegian Air Sports Federation*

We do not see the problems that the authors see with regard to ommitting the ARC in favour of a CRS statement. The lack of a standardised form is not a risk, the real state of the aircraft is much more important than a perfectly completed piece of paper.
In our view there are no questions related to a CRS statement which cannot be answered after consultation of the relevant Part-145 organisation or the person performing the review.

The agreed risk hierarchy should be applied also with regard to this issue, please see our comment #304. The ARC should be eliminated for all aircraft operating under Part-NCO, and the AR should be documented in the CRS.

For those wishing to operate the aircraft commercially, an ARC can still be required.

response

comment *323* comment by: *The Norwegian Air Sports Federation*

The CRS does not have a standardised format:

This can be solved by the Agency standardising the way an AR should be documented in the CRS.

There could be cases where the 100h/annual inspection is not performed together with an airworthiness review:

This can be solved by giving the owner the choice of an ARC or a CRS with an AR-signature. (I.e., the system could allow for two ways of documenting continuing airworthiness, perfectly matching the criterion of proportionate regulation.)

response

comment *343* comment by: *Howard Torode*

Comment by European Gliding Union

Possible elimination of the ARC, to be replaced by an additional statement included in a CRS

The point at issue here is not the ARC document itself, but the process that underpins it. In principle some kind of annual review document is required (even on simple aircraft such as gliders) to provide documentary evidenceof the aircraft's state of preparation. There seems now no reason why the physical and managerial aspects of this should not be carried out simultaneously, and at any juncture in scheduled maintenance cycle at the owner's convenience.

PML, with its wider scopes, enables approved organisations to function in all roles, which is to be applauded, but much better to have carried out a 'root and branch' review of the approvals structure for light sport aviation. For the present, our sports' national associations and supporting companies remain unclear as to which and how many expensive approvals under Part M (Sub F & G), Part 66 are required in future to deliver the simple airworthiness

fubctions, as they have donr successfully in the past. A combined simplified single regulation would benefit all levels, not just the owenr/operator.

Need to amend Basic Regulation

Item 2 For sailplanes, the need for an elaborate maintenance programee development can be challenged in many situations, particularly the case of 'orphan' and ageing airframes where the manufacturer either: (1) did not provide a maintenenace programme in the first place or (2) are no longer able to providemaintenance documentation or support. The simple solution here is to adopt the MIP as drafted herein, or otherwise re-classify them into Annex II.

(Item 2 3rd entry) In no circumstance do sailplane activities anticipate coming under CAT rules. The value of a separate CAMO approval needs to be considered in the context of total airworthiness management (Maintenance & CA). For lighter forms of sport and GA, this is where significant reductions in bureaucratic overheads could be acheived without loss of safety.

response

comment *358* comment by: *Kevin Meehan*

page 12

In addition the Agency is interested in Elimination of the ARC

I support this proposal - for many years as an Inspector, I have been able to ensure the airworthiness of a balloon by an inspection and issuing a CRS and without having to issue an ARC.The ARC is an unnecessary piece of paper and serves no purpose in maintaining an airworthy balloon and could be replaced with a suitably worded CRS.

response

comment *359* comment by: *Kevin Meehan*

page12 the agency is interested in - point 2 the need to amend basic regulations to eliminate the need for MP

I agree with this proposal.

A Maintenance Programme contains the maintenance requirements/tasks that needs to be carried out to ensure its continued airworthiness and for balloons this information is contained in the Balloon Manufacturers Flight and Maintenance Manuals.The need for a separate MP for balloons is not necessary.

response

comment *360* comment by: *Kevin Meehan*

page 13 point 2 The need to amend the Basic Regulation in order to: — eliminate the need for a maintenance programme;— include certain categories of balloons (and maybe other aircraft) in Annex II of the Basic Regulation; and — eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations

The requirement for a CAMO is not necessary to maintain airworthy balloons - whether in commercial operations or otherwise - it only adds another layer of unnecessary bureaucracy and added costs with no additional safety benefits

A balloon is a simple aircraft and it's airworthiness is maintained by a combination of Pilot owner maintenance, annual inspections and Inspectors approved to repair and maintain the various components.This applies to all sizes and shapes of balloons - there is no difference in maintaining the airworthiness of a small one man balloon and a large passenger carrying balloon- the standards are the same.

response

comment *370* comment by: *Howard Torode*

Comment by European Gliding Union

Stakeholder feedback on ARC replacement by additional statement in CRS

The concept for Part ML effectively pre-requires an ARC renewal to be combined with an annual inspection, so the paperwork for both should be combined. This was customary in many nations pre EASA. 'Term' inspections (eg: 100hours) need only be confirmed as 'in validity' during such wider reviews, unless these are combined for convenience. The opportunity to combine an ARC renewal with a 'term' inspection, either using a qualified organisation or licenced individual appears to offer certain freedoms, but would necessarily disturb a stable annual cycle, and could complicate demonstration of compliance to an auditor.

For a seasonal activity such as gliding, active sailplane clubs and pilots (flying more than 100hours/year) will be more concerned to maintain a stable annual review cycle, outside the soaring season, and will also disfavour a large anticipation of the annual review cycle because of additional costs. Thus it is unlikely that there would be much interest in a combined 100hour and ARC review option. It may however be useful in certain cases were the annual cycle seeks to be reset.

response

comment *380* comment by: *BGA*

response

comment *382* comment by: *BGA*

Segment description 2.4 Overview of proposed amendments Para 3, Page 12

Combining ARC and Certificate of Release to service.

The point at issue here is not the ARC document itself, but the process that underpins it. The BGA recognises that some kind of annual review document is required to provide the safe documentary evidence of the aircraft's state of preparation. There seems to be no reason why the physical and managerial aspects of this should not be combined in a single or composite form, particularly when the functions are carried out simultaneously, as would be the case in any scheduled maintenance. PML, with its wider scopes, enables approved organisations to function in all roles, which is to be applauded: but much better to carry out a 'root and branch' review of the approvals structure for light/sport aviation. For the present our sport remains unclear as to which, and how many, expensive approvals under Part 66, Part ML, and PM (Sub F and G) it will required in the future to deliver the simple airworthiness functions, as we have done successfully and safely in the past. A combined, simplified single regulation would be of benefit at the level of the approved organisations, and not just at the level of the owner/operator.

Segment description 2.4 Overview of proposed amendments Page 12

The standardisation of the form of the CRS

Historically, in UK gliding, we have used the logbook as a location for formal CRS signatures. We never have had a problem with this practice, which focuses attention, and promotes centralisation of record keeping. Even given proposals below to combine schedules maintenance and the ARC renewal this policy remains workable.

Segment description 2.4 Overview of proposed amendments Box on Page 12

Elimination of ARC to be replace by additional statement included in a CRS.

The BGA supports the idea of better combining these bureaucratic processes.*(The following is a repeat of previous comment...)* The point at issue here is not the ARC document itself, but the process that underpins it. The BGA recognises that some kind of annual review document is required to provide the safe documentary evidence of the aircraft's state of preparation. There seems to be no reason why the physical and managerial aspects of this should not be combined in a single or composite form, particularly when the functions are carried out simultaneously, as would be the case in any scheduled maintenance. PML, with its wider scopes, enables approved organisations to function in all roles, which is to be applauded: but much better to carry out a 'root and branch' review of the approvals structure for light/sport aviation. For the present BGA remains unclear as to which, and how many expensive approvals under Part 66, Part ML, and PM (Sub F and G), it will require in the future to deliver the simple airworthiness functions as we have done successfully and safely in the past. A combined, simplified single regulation would be of benefit at the level of the approved organisations, and not just at the level of the owner/operator.

Need to amend the Basic Regulation

(2) For simple aircraft such a sailplanes a basic MP will suffice. The need for an elaborate maintenance programme development can be challenged, particularly in the case of orphan aircraft, where manufacturer either: did not provide maintenance programmes in the first place, or are now on longer able to offer any maintenance support or advice. The simple satisfactory solution here is to invoke a MIP as proposed, or otherwise consider re-classification in Annex II. In UK, our MIP has fulfilled this need safely for the past 5 decades.

(2 - 3rd entry) In no circumstance are sailplane activities anticipated to come under CAT rules. The value of a CAMO needs to be considered in the context of total airworthiness management, (maintenance + Continuing airworthiness). For lighter forms of sport and GA this is where significant reductions in bureaucratic overheads could be achieved without loss of safety.

response

comment *400* comment by: *European Balloon Federation*

Re the limitations imposed by the BR, although they may appear in the BR, EBF submit that a more liberal interpretation of how to address them is possible.
For example:

- The maintenance programme information in the manufacturers/design holders documentation could easily be accepted as the maintenance programme. The BR imposes no requirements on the content or format of the MP, nor any requirements for its approval or oversight.
- An organisation responsible for the continuing airworthiness management does not have to be a CAMO as constituted in part M.

It seems that EASA are unable to break away from what has already been designed – perhaps a separate part balloons would allow a more radical departure from the status quo.

response

comment *401* comment by: *European Balloon Federation*

Re removal of the ARC:
EBF does not consider the reasons given by EASA as being adequate justification for retaining the separate ARC.
A standardised format for the CRS including the review element is a trivial matter. The over complicated form of words for the CRS exists already, this can be amended.
It should not matter if the CRS+Review statement is just a signature in the logbook or a separate document. If this is acceptable for the CRS, why not for the CRS+Review as well? The point being that, for balloons, the review is not something different, the elements are always done as part of the inspection anyway, so whatever is acceptable for the CRS should be acceptable for a combined CRS+Review.
Whatever the format of the CRS+Review statement, provided it is a common form of words, any NAA should be able to accept it for an inter-state transfer. These are comparatively

infrequent anyway, so this is an insufficient reason for retaining the ARC. If absolutely necessary, a separate CRS+Review certificate could be raised for this purpose alone.

It is in situations where an 100hr inspection is required which is out of phase with the review cycle, that the problems of having a separate ARC are most manifest. If this happens the ARC is out of phase with subsequent inspections, ultimately leading to additional, otherwise unnecessary, inspections to get them back in phase. Some NAAs charge for ARC notifications, so there is often an additional cost factor to be taken into account when managing the inspection and ARC cycles. It would be much simpler and cheaper to manage (with no reduction in safety) if ARCs did not exist.

response

comment *404* comment by: *Swedish Transport Agency*

(p12) Based on the above, several members of the Task Force are of the opinion that the requirements could still be further simplified, for example, by amending the Basic Regulation or by eliminating the need for an ARC. In order to be fully transparent, **the Agency has included in Section 5. 'Appendices', the vision and concerns of some of the members of the Task Force.**
Stakeholders and competent authorities are welcome to provide feedback on the issues raised in those Appendices.
In addition, the Agency is interested in receiving specific feedback on the following proposals:
1. Eliminate the ARC and replace it by an additional statement included in the CRS of the 100h/annual inspection.

STA comments:

- *It is not necessary after the implemented alleviations (GATF 1 and GATF 2).*
- *How should the State of registry keep control on the airworthy aircraft on the register?*
- *How should the investigator know after a crash if the aircraft has been airworthy or not?*
- *It must be visible in some kind of register if the aircraftis airworthy or not.*

2. The need to amend the Basic Regulation in order to:
— eliminate the need for a maintenance programme;
— include certain categories of balloons (and maybe other aircraft) in Annex II of the Basic Regulation; and
— eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations (this organisation, in the Implementing Rules, is called CAMO).

STA comments:

- *This proposal means it possible to remove Part-M/ML.*

response

comment *414* comment by: *FAA*

Section: In addition, the Agency has tried to keep certain provisions in order to facilitate the transfer of aircraft between Member States, such as for example the requirement to have the airworthiness review documented in a standardised format (ARC).

Comment: As part of the implementation of this rule, EASA may wish to develop guidance for those outside of the EU to aid in the process of approving (or gaining approval for) aircraft maintained under this part when such aircraft are being returned to a more traditional maintenance regimen.

response

comment *415* comment by: *FAA*

Page 12
Section:

The need to amend the Basic Regulation in order to:
— eliminate the need for a maintenance programme;

include certain categories of balloons (and maybe other aircraft) in Annex II of the Basic Regulation; and
— eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations (this organisation, in the Implementing Rules, is called CAMO).

Comment:

The maintenace program is essential to ensure continued safe operation. One developed by the manufacturer is detailed. Complex repairs need the detail offered in the program. Consider incorporating a guideline for the process of maintenenace without a programme.

Agree, aircraft not utilized in commercial operations can be maintained in a condition for safe operation without a managing organization.

response

comment *418* comment by: *FAA*

Page 12
Section:
Eliminate the ARC and replace it by an additional statement included in the CRS of the 100h/annual inspection.

Comment:
The ARC is part of the aircraft records, The statement would have to include all the maintenance performed for accuracy of the aircraft status. This is especially important for member states if the aircraft would be transferred.

response

comment *420* comment by: *Cameron Balloons Ltd*

Reduce the amount of paperwork. Combine the airworthiness review, ARC and CRS into one release document.
Make the maintenance programme a document included in the manufacturers existing maintenance manuals, but make sure that all manufacturers adhere to the same standard. Something that does not happen under the EASA system at the moment. EASA is supposed to bring in an harmonised system through out its jurisdiction, it has not achieved this. Acceptable standards of inspection and maintenance varies significantly between each country.

response

comment *433* comment by: *The Finnish Aeronautical Association*

On behalf of our seaplane flyers community, The Finnish Aeronautical Association wishes to comment:

1. We propose Part-ML to include also ELA2 aircraft in all the relaxations and not limit the "Light" to 1200 kg. Our seaplanes are of very simple build and have very little electronics and other sophisticated systems. Therefore their maintenance is also very simple and straightforward, so not in any way more demanding than that of typical ELA1 aircraft.

Please note, however, that the first priority is the relaxation of the maintenance rulings. The inclusion of ELA2 shall not be used as a pretext for any more onerous rulings than those now proposed in Part-ML.

For seaplanes it would be very heavy to continue under Part-M, because there exists only one maintenance and repair station in the whole country with a ramp to take planes from water. We have 4 persons seating, fly privately. The C180 is a very simple plane with manual flaps and carburetor without fuel pump.

If the proposed 1200kg limit will stay, we propose reconsideration and updating of EASA ANNEX II aircrafts list. Our planes are approximately 50 years old and this type has not been in production during decades. It can not be the meaning, that ANNEX 2 list is not updated periodically. We hope that EASA would ease the whole non complex GA fleet in this matter.

response

comment *438* comment by: *Dutch gliding association*

The ARC can be seen as superfluous. The real issue is that periodic maintenance is performed and functionality / airworthiness of the glider and equipment is periodically checked (yearly, hours, launches). One could consider to introduce a harmonized A-5 document that is to be carried on board in which a competent person or company can stamp of the annual maintenance, checks and release to service. This could be done as we know it from automotive, where passenger cars are provided with a logbook where maintenance can be confirmed with e.g. a stamp and a signature. Since the document is harmonized, the glider

	can be easily transferred from on EASA country to the next.
response	

comment	*457* comment by: *Chris Davies* Eliminate the ARC it has no value fo balloons
response	

comment	*458* comment by: *Chris Davies* CAMO are not useful to balloons
response	

comment	*461* comment by: *flyingadverts* I support the elimination of the arc and replace with a simple statement on the CRS The ARC has nothing to do with safety and just another layer of bureaucracy To have an ARC on normal inspections just to simplify transfer between member states is just daft. It is unnecessary on standard inspections for the relative tiny amount of balloon or aircraft sales across borders to impose it as part of the normal inspection routine.
response	

comment	*516* comment by: *European Balloon Federation* **In addition, the Agency is interested in receiving specific feedback on the following proposals:** 1. Eliminate the ARC and replace it by an additional statement included in the CRS of the 100h/annual inspection. The EBF are adamant that the separate ARC should be removed. Whilst it exists it perpetuates the myth that the associated review and the annual/100hr inspection are two separate activities, merely being done at the same time; whereas in the case of balloons and probably other simple aircraft, the airworthiness review is simply part and parcel of a complete thorough inspection. Whilst the airworthiness review/ARC is treated as a separate activity from the inspection, there exists two separate dating protocols, with the attendant confusion and added complexity of management.
response	

comment	*517* comment by: *European Balloon Federation* **In addition, the Agency is interested in receiving specific feedback on the following proposals:**

2. The need to amend the Basic Regulation in order to:

The Basic Regulation should be amended as required to permit the changes required in the implementing rules. Without such changes, much time and effort can be wasted in designing implementing rules to somehow get around the fundamental limitations of the BR. The BR should not be seen as somehow sacrosanct and inviolate. In fact, only minimal changes to the BR should be necessary for the proposals suggested, such as eliminating the MP and not requiring a CAMO.

response

comment *535* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

FOCA has some concerns about an elimination of the ARC. This could potentially create problems when the documents are reviewed by the competent authority for the purpose of accepting the transfer of an aircraft from another Member State (e.g. not standardised forms).
There should be no requirement for a Maintenance Programme for Balloons. The generic programmes published by all manufactures are sufficient.

response

comment *544* comment by: *WESERTRAINER FLIGHT TRAINING*

Concept of ARC / Transfer of aircraft between Memberstates / Independent judgement and expertise / Validity Period

Benefits of the ARC Concept

1. The ARC ensures the easy transfer of aircraft between memberstates by a standardized multilateral acceptable certificate.

2. An airworthiness review performed by CAMO indepent from organisations and persons perfoming maintenance may provide independent judgement and expertise to make an qualified decission if maintenance actions required or not.

Adaption to ELA 1 / ELA 2 Concept

ARC of ELA1 / ELA 2 should be generally valid for a period of three years. This would be proportionate to the average flight hours per year, the low complexity and the risk assessment of affected aircraft. Also the paperwork will be reduced to a appropriate amount.

EASA should also take into account that most Owners / Operators today are well-informed about airworthiness issues concerning their aircraft via the Internet by custom support and owners associations etc.

response

comment *567* comment by: *Colin Wolstenholme*

	feedback on elimination ofhte ARC Wholehearted support for elimation of the ARC, it adds nothing to the safety of ballooning and is simply the application of a process for aircraft transferred to balloons with a huge number of unintended consequences and burdens on ballooning as a result, non of which improve teh safet aspect of flying balloons. Apreciate and thank you for confirming you are able to remove ARCs for balloons - and accept that it could be retained to ease re registration of a balloon in a second coutry.
response	

comment	*568* comment by: *Colin Wolstenholme* reference item 2 eliminate need for maintenance programme As before the manufacturers manuals provide all that is required to maintina a balloon - simplication of the process for simple aircraft is welcomed.
response	

comment	*570* comment by: *Colin Wolstenholme* ref 2 A CAMO only adds costs and paperwork to a commercial balloon operations, nothing is added to the safety of the ballooon becasue of the existence of a CAMO. They should not be needed.
response	

comment	*595* comment by: *ULTRAMAGIC, S.A. (JVT)* **Section 2.4: Feedback on Item 1**: Eliminate the ARC and replace it by an additional statement included in the CRS of the 100h/annual inspection ULTRAMAGIC supports the measures to allow an airworthiness review in conjunction with the 100h/annual inspection. Including an additional statement to the CRS to prescind from a separate ARC seems reasonable. The addition of a reference CRS Form in the AMC/GM might help to standardize the format. The section added to cover the Airworthiness review might be applicable or not (i.e. marking a checkbox). **Section 2.4: Feedback on Item 2**: The need to amend the Basic Regulation in order to: Eliminate the need for a maintenance programme: ULTRAMAGIC does not support the suppression of the Maintenance Program, but fully supports its simplification, which for a simple aircraft such a balloon, should not extend more than a single page. Include certain categories of balloons in Annex II of the Basic Regulation: ULTRAMAGIC does NOT support this point at all. Eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations (CAMO): ULTRAMAGIC has no objection to the suppression of the CAMO for all Part-ML aircraft, as

	long as some of the responsibilities/privileges are transferred to Approved Maintenance Organisations.
response	

comment	*604* comment by: *René Meier, Europe Air Sports* 2.4. Overview… Page 11 Remark: What about a new "Basic Regulation"? Rationale: For many years now always the same provisions of the Basic Regulation have been critisised. In our view, the time is here to do what is right, not what is easy. The Basic Regulation in force hinders progress, there is not enough flexibility built-in. Political solutions do not solve technical problems, legislation is very often up to ten years behind technical evolution, therefore is time to start thinking of a replacement of provisions created in 2008.
response	

comment	*618* comment by: *René Meier, Europe Air Sports* Certainly, it could have been possible… Page 12 Remark: Not accepted! Your proposed text is not clear to us. Rationale: We do not see the problems the authors see. The lack of a standardised form is not a risk, the real state of the aircraft is much more important than a perfectly completed piece of paper. In our view there are no questions which cannot be answered after consultation of Part- 145. The agreed risk hierarchy should be applied also with regard to this issue. ARC should be eliminated for all aircraft operating under Part-NCO/Part-NCC, and the AR should be documented in the CRS.
response	

comment	*620* comment by: *René Meier, Europe Air Sports* Page 12 Remark: In our view the lack of a standardised CRS is not a problem. This can be solved by the Agency standardising the way an AR should be documented in the CRS. Rationale: The certified quality of the tasks performed by the competent individual is important, not the beauty of a document.

response

comment *621* comment by: *René Meier, Europe Air Sports*

There could be cases...
Page 12
Remark
This can be solved by giving the owner the choice of an ARC or a CRS with an AR-signature. (I.e., the system could allow for two ways of documenting continuing airworthiness, perfectly matching the criterion of proportionate regulation.)

Rationale:
There are technical solutions and sufficiently secure communication channels in place to overcome what is now considered to be a weakness.

response

comment *641* comment by: *DGAC France*

When in the beginning of §2.4 it is indicated that "The amendments proposed through this NPA have obtained the support of the members of the 'Part-M General Aviation Task Force', being regarded as a very significant improvement compared to the current requirements", DGAC France wishes to highlight that of course all members of the Part M General Aviation Task Force had the idea in mind to improve the existing requirements to simplify them, but the NPA is a compromise resulting from discussions between experts but that it is not necessary that the authority of members of this task force is not necessarily agreeing with all the conclusions.

response

comment *645* comment by: *DGAC France*

DGAC France is not in favour of the following proposals developed in §2.4 :
1. Eliminate the ARC and replace it by an additional statement included in the CRS of the 100h/annual inspection.
(without further substantiation, it is difficult to see the interest of such proposal)
2. The need to amend the Basic Regulation in order to:
— eliminate the need for a maintenance programme;
(not compliant with ICAO)
— include certain categories of balloons (and maybe other aircraft) in Annex II of the Basic Regulation; and
(not acceptable, because it will also exclude them from the TC issuance, for which Europe has experience, which is better for the TCH to reduce the burden of certifying in 28 countries, etc.)
— eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations (this organisation, in the Implementing Rules, is called CAMO).
(now that the concept is in the European regulation, it seems difficult to withdraw the CAMO as many organisations made several efforts to organise and provide ressources to become CAMO)

response

comment *684* comment by: *Balóny Kubíček*

Refer to page 12 of 77, point to in the bottom of the page - eliminate the need for a maintenance programme
Balloons are easy aircraft what does not require specific maintenance programme for each of them. A maintenance manual issued by each of balloon manufacturer fulfils the task of maintenance programme more than enough.
In case that some parts of balloon are manufactured by a different manufacturer you just look to applicable manual.
There is no need for maintenance programme there is no value in safety. Our company holds a hundreds MP for each of balloon held under our CAMO. And we do need this papers at all. They are issued just because EASA asks for. There is no real value just increased costs which needs to be passed to our clients.
We, KUBICEK BALLLOONS would strictly recommend to remove any requirement for Maintenance Programme for balloons - Basic Regulation and Part-ML

response

comment *685* comment by: *René Meier, Europe Air Sports*

Based on the above…
Page 12
Remark:
We agree with the members of the Task Force asking for further simplified provisions.

Rationale:
Indeed, more can be done to alleviate our tasks as pilot/owners

Proposal 1, CRS combinable with 100 hours/annual inspection is a good proposal.

Proposal 2: In any case, the entire Basic Regulation needs to be replaced, eliminating the need for ARC is just a first step . Carefully enlarging Annex II for sure is not negative, but this needs careful consideration. And the entire CAMO regulations must be re-assessed.

response

comment *696* comment by: *European Sailplane Manufacturers*

Sadly again it was not possible to propose changes to the basic regulation within the process to develop the Part-ML.
This means that again the "light Part-M" could not become as light as it really needs to be.

See our general comments and the last page in the NPA about our vision for a really light Part-M....

response

comment *697* comment by: *European Sailplane Manufacturers*

	Of course the sailplane manufacturers belong to these "member of the task force". Yes we would very much to see the listed alleviations in the basic regulation - at least for ELA1 aircraft and we have expressed these whishes and the reasons already within several NPA´s and similar EASA questionaires.
response	

comment	*700* comment by: *European Sailplane Manufacturers* Elimination of the ARC is not a preferred option for the sailplane manufacturers. Looking over the aircraft at least once per year (or perhaps once every two years) should be considered good practice and is often exactly what also the owners ask for. Admittedly the ARC is not directly this inspection but it is considered to be a good incentive not to forget to conduct such an inspection. Of course we are in full favour to minimize all paperwork with the ARC not directly related to the technical check that the aircraft is in a technical sound status and that it is airworthy.
response	

comment	*704* comment by: *Quality Manager Easy Balloons Ltd* In addition, the Agency is interested in receiving specific feedback on the following proposals: 1. Eliminate the ARC and replace it by an additional statement included in the CRS of the 100h/annual inspection. Amazingly this is what we used to do. It worked perfectly well then and mirrors what we still do in the case of privately operated balloons. The promise of EASA was to provide a level playing field with common practices across all EASA countries. This does not happen as we are continuing to find out. When it comes to transferring balloons (or any aircraft) between EASA countries it really should be a stamp on a bit of paper. It is already complicated under the current regime so I don't suppose it will make any difference if it is made 'more complex'. Again I would raise the commercial aspect.
response	

comment	*705* comment by: *Quality Manager Easy Balloons Ltd* 2. The need to amend the Basic Regulation in order to: — eliminate the need for a maintenance programme. Agree. The Schedule and logbook covers everything in them and they are the first thing to go missing! We usually have to provide a copy to the owner every year!
response	

comment	*706* comment by: *Quality Manager Easy Balloons Ltd* 2. The need to amend the Basic Regulation in order to: — eliminate the need for a

	maintenance programme;— include certain categories of balloons (and maybe other aircraft) in Annex II of the Basic Regulation; and — eliminate the need for an organisation managing the continuing airworthiness of aircraft involved in commercial operations Annex II should be applied to all smaller privately owned balloons and the Regulations applied to them should be the same throughout all EASA countries allowing them to fly in any other EASA country unchallenged by bureaucracy. Our experience has shown that balloons engaged in passenger operations should be managed either in house by reducing the cost of holding a CAMO or by an outside provider. One has to remember that this is a European thing and developing rides businesses do need oversight if the high safety standards are to be maintained.
response	

2. Explanatory Note — 2.4. Overview of the proposed amendments — 1. Proposal for a separate Part-ML p. 13-14

comment	*115* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden* **Applicability:** As presented in our vision, AOPA would like to extend the applicability all the way up to include all "non-CMPA". We also understand that it might seem like a big step but we are satisfied if the Agency states that the current applicability is just the beginning and as time and flight hours passes, the applicability will be discussed in order to extend it to include heavier aircraft.
response	

comment	*116* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden* **Type of operation:** AOPA is very happy that the discussion of what's commercial and not is dealt with in a good manner here. In the future we would also like to see a discussion to give full alleviations to other types of operations as well, for example Part-SPO where it often is very low risk to third party, just as in Part-NCO.
response	

comment	*163* comment by: *DE LOOF JEAN PIERRE* Moving ligth gliders in Annex II After having modifief weight criteria to be coherent with ULM Criteria (the present limitation of 80 kg jus fit for hang gliders!) This would offer a new gliding activity using very light gliders, these gliders offering good performances at lower cost, avoiding certifying process too long and expensive, in the same way that ULM opportunity.
response	

comment	*168* comment by: *DE LOOF JEAN PIERRE* After Having modified
response	

comment	*231* comment by: *CAA-NL* **Page 13 of 77 Point 1, Proposal for a separate Part ML** With the introduction of Part ML and the possibilities for owners to choose certain items from Part M, the related changes made to Part M with regulation 1088/2015 limited to ELA1 not used for commercial operations should then be deleted again from Part M. This includes the following items: · M.A.201(e)(ii) second indent. · M.A.302(h) and M.A.302(i) · M.A.901(g) · M.B.301 · Appendix VIII to Part M Also the following items in Part M and Part 145 need to be amended to be in compliance with the new Part ML, specifically the current limitation to ELA1 non commercial needs to be amended and also some reverences need to be changed to Part ML points: · M.A.606(i) and M.A.606(j). · M.A.615(e) and M.A.615(f). · M.A.710(ga). · M.A.901(l). · Appendix IV in the table item 13 · 145.A.30(k) and 145.A.30 (l) · 145.A.75(f) and 145.A.75(g)
response	

comment	*232* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016* There is absolutly no need of a Part-M or Part-ML for an ELA1 and ELA2 aircraft. Wether for non-commercial or commercial use. These types of aircraft are a so simple in there design, that any regulations will miss the targets for more safety in aviation. If you want such regualtions, please do the same for the automotive industry! Vehicles are much more complex and can do much more harm!
response	

comment	*549* comment by: *GIPAG France (French General Aviation Operators Professional Union)* First of all, as already asked before, GIPAG would like a better definition of the term “Commercial Operation” even if EASA decided to use the term Part-NCO instead. Both of these terms do not fit to all general aviation activities (for example: Flying School). All the organisations operating flights with a transfer of cash should be defined as “Commercial Operation” especially within the flight association. Today in France, an Association can

realise commercial activities even if they are considered by the administration as a non-making profit body. With this new regulation, the GIPAG France is asking to EASA that these associations have to be considered as an organisation making "Commercial Operation". These organisations have to be legally responsible for their actions and should not transfer their responsibilities to the approved organisations (Part G, Part-145 or Part-M subpart F).

This NPA must only deal with for Part-NCO in the first place. Using this kind of alleviations in "commercial operation" will impact the safety of flights by reducing the safety limitations in complex operations.
Besides, GIPAG France wants to reduce the scope to ELA1 for aircrafts. Many aircraft categories ELA1 & 2 require complex maintenance operations which should be carried out in approved maintenance organisations for security reasons. It is therefore requested that initially the limit is raised to ELA1 included.

Then, as regards helicopters, 4 seats helicopters are considered complex and need to be also excluded from this scope.
Moreover since the European regulations decided to separate ELA1 and ELA2. This raises the following issue: why should we group them today? GIPAG France wants to continue maintaining this separation for clarity in the regulations.

To conclude, the scope must be limited to ELA1 aircraft and helicopter under 4 seats in Part-NCO. Then, if the feedbacks demonstrate that the high level of safety requested by the EASA is achieved, the EASA will be able to pull up limitations.

response

comment *608* comment by: *FNAM (French Aviation Industry Federation)*

First of all, as already asked before, FNAM would like a better definition of the term "Commercial Operation" even if EASA decided to use the term Part-NCO instead. Both of these terms do not fit to all general aviation activities (for example: Flying School). All the organisations operating flights with a transfer of cash should be defined as "Commercial Operation" especially within the flight association. Today in France, an Association can realise commercial activities even if they are considered by the administration as a non-making profit body. With this new regulation, the FNAM is asking to EASA that these associations have to be considered as an organisation making "Commercial Operation". These organisations have to be legally responsible for their actions and should not transfer their responsibilities to the approved organisations (Part G, Part-145 or Part-M subpart F).
This NPA must only deal with for Part-NCO in the first place. Using this kind of alleviations in "commercial operation" will impact the safety of flights by reducing the safety limitations in complex operations.
Besides, FNAM wants to reduce the scope to ELA1 for aircrafts. Many aircraft categories ELA1 & 2 require complex maintenance operations which should be carried out in approved maintenance organisations for security reasons. It is therefore requested that initially the limit is raised to ELA1 included.
Then, as regards helicopters, 4 seats helicopters are considered complex and need to be also excluded from this scope.
Moreover since the European regulations decided to separate ELA1 and ELA2. This raises the following issue: why should we group them today? FNAM wants to continue maintaining this separation for clarity in the regulations.

	To conclude, the scope must be limited to ELA1 aircraft and helicopter under 4 seats in Part-NCO. Then, if the feedbacks demonstrate that the high level of safety requested by the EASA is achieved, the EASA will be able to pull up limitations.
response	

comment	*623* comment by: *René Meier, Europe Air Sports* 1. Proposal for a separate Part-ML Page 13 Remark: We highly welcome this proposal. Rationale: We always asked for proportionate, risk-based rules appropriate to our operations being of nearly no risk to third parties.
response	

comment	*624* comment by: *René Meier, Europe Air Sports* NOTE… The definition of ELA2 Page 13 Question: Only here or throughout the entire set of maintenance related provisions?
response	

comment	*625* comment by: *René Meier, Europe Air Sports* In terms of types of operations… Page 13 Remark: Many thanks for this provision allowing commercial and non-commercial operations. Rationale: This gives the flexibility to the operators required today in a difficult economic environment.
response	

comment	*626* comment by: *René Meier, Europe Air Sports* It is important to note… Page 13 Remark: We insist on the requirement for a better definition of what is commercial or non-commercial. Rationale: The scope of the undertaking operating the flight must be the basis, not the fact that money

	is changing hands, money always changes hand, also within the perfectly organised “not for profit” aero-clubs. Where else could the financial means to pay the bills for oversight and maintenance come from as from the members?
response	

comment	*660* comment by: *AOPA Finland* In terms of aircraft categories, Part-ML should be applicable to: • ELA2 aircraft certified for up to 6 occupants and up to 2000 kg MTOM
response	

comment	*688* comment by: *René Meier, Europe Air Sports* In order to… Page 14 Remark: Accepted, provided not too frequent amendments render it “unreadable”. Rationale: The complexity of today’s “Part-M” makes us submitting the above statement. Frequently published consolidated versions of the new “Part-ML” would help.
response	

comment	*695* comment by: *European Sailplane Manufacturers* The decision of the Part-M task force to open the alleviations already included in Part-M today now for ELA2 aircraft and also commercial operations was a much debated decision. The one proposal made by the sailplane manufacturers not reflected in this NPA is to allow commercial operations only, if the operator is then required to inform the passengers accordingly and perhaps to mark the aircraft accordingly with placards or similar. This proposal should be included here.
response	

2. Explanatory Note — 2.4. Overview of the proposed amendments — 2. Alleviations related to the maintenance programme p. 14-16

comment	*19* comment by: *Ulrich NIGGLI* In ELA1 / NCO operations, a recommendation of a DAH must stay a recommendation. This should be explicitly mentioned, so the NAAs can't impose tighter rules.

response

comment *46* comment by: *BBAC British Balloon and Airship Club (UK)*

Possibility (option) for the owner/operator to issue a declaration for their own maintenance programme (applicable to all aircraft and operations within the scope of Part-ML).

BBAC: Supported as a principle, but very unlikely to be applied in balloons. Balloons are so simple that the generic AMP from the Manufacturer is always sufficient. Again, we submit that reference to the manufacturer's maintenance manual is completely sufficient and no separate AMP is needed for balloons.

response

comment *47* comment by: *BBAC British Balloon and Airship Club (UK)*

Introduction of 'Minimum Inspection Programmes' which may be used as a basis for the development of the maintenance programme (applicable to all aircraft and operations affected by Part-ML, except for airships and rotorcraft due to the difficulty to establish common requirements for them).

BBAC: Supported as a principle, but we believe that balloons do not need individual AMPs. Therefore this MIP, in the case of balloons, should be given in Part ML as the primary reference point and then no separate individual AMPs will be needed. This would be even more simple than using generic AMPs per manufacturer.

response

comment *213* comment by: *Allie Dunnington*

I am not against this proposal but as said before, manufacturers provide all the relevant information in their balloon flight manuals and MPs are not necessary for hot air balloons

response

comment *214* comment by: *Allie Dunnington*

Introduction of Minimum Inspection Programmes:
Again, not a bad idea and certainly better than having full Inspection Programmes in 'aeroplane'-style, but like mentioned in previous statements, even this is not needed as the DAHs' already provide all the relevant data and information for safe inspections.

response

comment *215* comment by: *Allie Dunnington*

page 16. 3 Alleviations related to airworthiness reviews:

This is a very good proposal and in fact what UK CAMOs have been doing for the last 7 or 8

	years. There is no reason why the inspecting organisation or person could not issue an ARC at the same time as they do the annual inspection but in general I oppose the existence of ARCs as they are 'just another piece of paper' with no added value except that they cost more time to issue and time is money for the inspector and the balloon pilot. I therefore along the same lines would support the proposal of having independent certifying staff performing the ARC and issuing it but am in principle for the abolishment of ARCs altogether.
response	

comment	*236* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016* Yes, an owner/operator can do the complete maintenance for an ELA1, ELA2 aircraft by his own. He will sign for his job and he will be responsible for his work!
response	

comment	*309* comment by: *Jos TREHERN* **Re: Possibility (option) for the owner/operator to issue a declaration for their own maintenance programme (applicable to all aircraft and operations within the scope of Part-ML).** This is supported in principle. However, since balloon manufacturers provide sufficient information in their manuals, maintenance programmes are not needed for balloons.
response	

comment	*310* comment by: *Jos TREHERN* **Re: Introduction of 'Minimum Inspection Programmes' which may be used as a basis for the development of the maintenance programme (applicable to all aircraft and operations affected by Part-ML, except for airships and rotorcraft due to the difficulty to establish common requirements for them).** This is supported in principle. However for ballooning the manufacturers (DAHs) already provide entirely adequate and satisfactory data.
response	

comment	*345* comment by: *Howard Torode* Comment by European Gliding Union. Possibility of owner/operator to issue declaration of their own MP EGU supports the principle (see previous comment), but feels some level of audit would be necessary before the execution of the programme by an approved person or body, particularly if MPdeviations are needed to be reported to the NAA on a detailed acle as proposed elsewhewre in PML.

For simple airframes such as sailplanes, the customisation of the MIP permits the ideal AMP to be developed, combining the best practices of both manufacturuer and utilisation under the MIP. Deviations from this should be limited to justification of particular curcumstances/usage such as TBO decisions. Clearly no relevant maintenance that is included in the MIP should be discarded.

response

comment *348* comment by: *Howard Torode*

Comment by European Gliding Union

'Introduction of MIP which may be used as a basis of development of an AMP applicable to all PML aircraft'.

Supported, given the proposed, generic classification of airframe types - glider, balloon etc, and possible extension to manufacturer product ranges. Surely this is the basis purpose of a MIP. Organisations and approved individuals should have maximum freedom to review the relation of the MIP to the manufacturers recommendations.

response

comment *383* comment by: *BGA*

Segment description 2.4 Overview of proposed amendments Page 15

2.4 Possibility/Option for owner/operators to issue a declaration for their own MP

(Repeat comment) Support in principle, particularly if other measures (herein) enable group, or generic maintenance programmes or maintenance programmes produced in the future by manufacturers that over-arch the MIP. However some level of acceptance or audit would probably be required during the execution of this MP by an approved person or body.

For simple airframes such as sailplanes, the customisation of the MIP permits the ideal MP to be developed, combining the best practices in both. Deviations from this should be limited to justification of particular circumstances/usage such as TBO decisions. Clearly no relevant maintenance that is included in the MIP should be discarded.

Segment description 2.4 Overview of proposed amendments Page 15

Introduction of MIP which may be used as a basis of development of an MP (applicable to all PML aircraft)

Supported, this is surely the basic purpose of a MIP. Organisations and approved individuals should have maximum freedom to review the relation of the MIP to manufacturers recommendations

response

comment	*422* comment by: *Cameron Balloons Ltd* Allowing an owner to issue a declaration for their own maintenance is NOT A GOOD IDEA.
response	

comment	*423* comment by: *Cameron Balloons Ltd* The minimum inspection programme must be the manufacturers inspection schedules, there can be nothing below this.
response	

comment	*462* comment by: *flyingadverts* Point 2, Eliminate the maintenance programme and support simplification for balloons Maintenance Programmes are not required as separate documents because the manufacturers' manuals are the defining documents. Balloon owners have no idea what MPs are or what they are for, and have no practical use. Just another layer of paperwork when the manufacturers manuals are the defining document. CAMOs should not be a requirement for commercial balloon operations, since all balloons are extremely very simple aircraft there is no demonstrated safety benefit. CAMOs just add costs and bureaucracy and not proportional regulation.
response	

comment	*463* comment by: *flyingadverts* MIPs are not needed for balloons since manufacturers provide complete information in their manuals, and are the defining documents from the design authority holders.
response	

comment	*518* comment by: *European Balloon Federation* **Possibility (option) for the owner/operator to issue a declaration for their own maintenance programme (applicable to all aircraft and operations within the scope of Part-ML).** EBF supports this principle (as an alternative to approval of the AMP), although would point out that there is no requirement in the BR itself for any such declaration or approval, merely that a maintenance programme exists for the aircraft to be maintained to.
response	

comment	*519* comment by: *European Balloon Federation*

Introduction of 'Minimum Inspection Programmes' which ...

EBF supports this in principle, however considers it unlikely to be of use for balloons, where the DAHs information says the same thing in less generic terms.

response

comment *551* comment by: *GIPAG France (French General Aviation Operators Professional Union)*

Each airplane has different specific features and variances. Due to this fact, the GIPAG France do not agree that a given aircraft MP can solely comply with a generic MIP. Any MP, even simplified has to comply with the one and only relevant MP which is the "Manufacturer MP". The MP should have as reference the only and unique reference of M.A.302 (d) and (e) as following:
"(d) The aircraft maintenance programme must establish compliance with:
(i) instructions issued by the competent authority;
(ii) instructions for continuing airworthiness:
• issued by the holders of the type certificate, restricted type-certificate, supplemental type-certificate, major repair design approval, ETSO authorisation or any other relevant approval issued under Regulation (EC) No 1702/2003 and its Annex (Part-21), and
• included in the certification specifications referred to in point 21A.90B or 21A.431B of the Annex (Part-21) to Regulation (EC) No 1702/2003, if applicable;
(iii) additional or alternative instructions proposed by the owner or the continuing airworthiness management organisation once approved in accordance with point M.A.302, except for intervals of safety related tasks referred in paragraph (e), which may be escalated, subject to sufficient reviews carried out in accordance with paragraph (g) and only when subject to direct approval in accordance with point M.A.302(b).
(e) The aircraft MP shall contain details, including frequency, of all maintenance to be carried out, including any specific tasks linked to the type and the specificity of operations."

An owner needs to have the knowledge and the expertise to decide. The manufacturer MP has been created by mechanics who know how the ELA works. The manufacturer spent time to create the best manufacturer MP to make sure the ELA will not have any incident due to bad maintenance and bad decision. An owner does not have the knowledge to take the good decision. Why are we deciding now that someone with neither expertise nor knowledge is able to do the work of mechanics who have a minimum of 5 years of experiences?

In addition to this comment, the GIPAG France do not agree with the fact that the owner can issue a declaration for his/her own aircraft's MP which would not need to be approved by the competent authority. This advantage jeopardises the Manufacturer. Indeed it does not match with the safety level sought by the EASA but rather with the economic context by prevailing lower costs rather than an increase in flight safety. Final customers wonder if somebody has ever been able to establish the connection between any potential increase in flight safety and a true increase in cost of maintenance.
Besides, as already written in the paragraph 2.3.4, this NPA's proposal represents a loss of business for CAMOs that have invested in IT and human resources to meet the requirements of the authority regarding aircraft airworthiness. And suddenly this NPA wants to change this. This change will undermine their efforts, especially for some companies, for whom being a CAMO is the only activity.

	To be more specified, GIPAG is against the possibility that the owner can define its own maintenance program without following the manufacturer's MP and their recommendations. GIPAG France demands that the MP is approved either by a CAMO or by the authority, and that it is consistent conforms to the manufacturer's MP. GIPAG France may accept that the MP is not necessarily approved but it has to be, *a minima*, compliant to the manufacturer's MP.
response	

comment	*574* comment by: *Colin Wolstenholme* ref own maintenance programme The idea has merit but as manufacturers provide all the necessary information in their manuals a separate maintenance programme for balloons is not necessary.
response	

comment	*575* comment by: *Colin Wolstenholme* ref minimum iunspection programme The balloon maufacturers already provide all the necessary informaion
response	

comment	*596* comment by: *ULTRAMAGIC, S.A. (JVT)* **Introduction of 'Minimum Inspection Programmes':** ULTRAMAGIC does not support the optional use of MIP instead of the maintenance schedule recommended by the DAH. In most of the cases MIP may be perfectly applicable, but this might not cover all the exceptions and specific requirements. Therefore the responsibility of the DAH in terms of developing and establishing a particular Maintenance Schedule might no longer be clear.
response	

comment	*609* comment by: *FNAM (French Aviation Industry Federation)* Each airplane has different specific features and variances. Due to this fact, the FNAM do not agree that a given aircraft MP can solely comply with a generic MIP. Any MP, even simplified has to comply with the one and only relevant MP which is the "Manufacturer MP". The MP should have as reference the only and unique reference of M.A.302 (d) and (e) as following: "(d) The aircraft maintenance programme must establish compliance with: (i) instructions issued by the competent authority; (ii) instructions for continuing airworthiness: • issued by the holders of the type certificate, restricted type-certificate, supplemental type-certificate, major repair design approval, ETSO authorisation or any other relevant approval issued under Regulation (EC) No1702/2003 and its Annex (Part-21), and • included in the certification specifications referred to in point 21A.90B or 21A.431B of the Annex (Part-21) to Regulation (EC) No 1702/2003, if applicable;

(iii) additional or alternative instructions proposed by the owner or the continuing airworthiness management organisation once approved in accordance with point M.A.302, except for intervals of safety related tasks referred in paragraph (e), which may be escalated, subject to sufficient reviews carried out in accordance with paragraph (g) and only when subject to direct approval in accordance with point M.A.302(b).
(e) The aircraft MP shall contain details, including frequency, of all maintenance to be carried out, including any specific tasks linked to the type and the specificity of operations."
An owner needs to have the knowledge and the expertise to decide. The manufacturer MP has been created by mechanics who know how the ELA works. The manufacturer spent time to create the best manufacturer MP to make sure the ELA will not have any incident due to bad maintenance and bad decision. An owner does not have the knowledge to take the good decision. Why are we deciding now that someone with neither expertise nor knowledge is able to do the work of mechanics who have a minimum of 5 years of experiences?
In addition to this comment, the FNAM do not agree with the fact that the owner can issue a declaration for his/her own aircraft's MP which would not need to be approved by the competent authority. This advantage jeopardises the Manufacturer. Indeed it does not match with the safety level sought by the EASA but rather with the economic context by prevailing lower costs rather than an increase in flight safety. Final customers wonder if somebody has ever been able to establish the connection between any potential increase in flight safety and a true increase in cost of maintenance.
Besides, as already written in the paragraph 2.3.4, this NPA's proposal represents a loss of business for CAMOs that have invested in IT and human resources to meet the requirements of the authority regarding aircraft airworthiness. And suddenly this NPA wants to change this. This change will undermine their efforts, especially for some companies, for whom being a CAMO is the only activity.
To be more specified, FNAM is against the possibility that the owner can define its own maintenance program without following the manufacturer's MP and their recommendations. FNAM demands that the MP is approved either by a CAMO or by the authority, and that it is consistent conforms to the manufacturer's MP. FNAM may accept that the MP is not necessarily approved but it has to be, *a minima*, compliant to the manufacturer's MP.

response

comment *707* comment by: *Quality Manager Easy Balloons Ltd*

Possibility (option) for the owner/operator to issue a declaration for their own maintenance programme (applicable to all aircraft and operations within the scope of Part-ML).

This depends largely whether MPs are removed or not. Providing the person issuing the Declaration understands their role, agreed.

response

comment *708* comment by: *Quality Manager Easy Balloons Ltd*

Introduction of 'Minimum Inspection Programmes' which may be used as a basis for the development of the maintenance programme (applicable to all aircraft and operations affected by Part-ML, except for airships and rotorcraft due to the difficulty to establish common requirements for them).

	In the case of balloons, if I understand this to mean 'Generic' then agreed.
response	

2. Explanatory Note — 2.4. Overview of the proposed amendments — 3. Alleviations related to airworthiness reviews p. 16-17

comment	*4* comment by: *Guillaume SUDRE* It should be possible for independent certifying staff to perform airwothiness review for aircraft up to ELA**2** operated under Part-NCO. I don't think there is huge difference between ELA1 and ELA2 regarding airwothiness review.
response	

comment	*13* comment by: *Ulrich NIGGLI* It is made clear that a individual national certifying staff licence holder (for example for sailplanes) only has the privilege to perform airworthiness reviews of aircraft registered in the state of the licence. However the question is unanswered if the licence holder is allowed to perform and release regular maintenance tasks on aircraft registered in another state. The LBA and BAZL have not been able to answer this question when I asked them in 2014. This should be allowed at least for ELA1 as long as there is no Part66 licence available in all member states.
response	

comment	*48* comment by: *BBAC British Balloon and Airship Club (UK)* **3. Alleviations related to airworthiness reviews** Building upon the alleviations already introduced during Phase I of the 'Part-M General Aviation Task Force', the following alleviations have been proposed: **— Possibility for a Part 145 or M.A. Subpart F maintenance organisation to perform the airworthiness review and issue the corresponding ARC at the same time they perform the annual inspection contained in the maintenance programme (applicable to all aircraft and operations affected by Part-ML).** BBAC: This is vigorously supported. This has been the approved practice in UK since the start of Part M, for balloons. Since there is no difference whatsoever between the "inspection" and "survey" activities, UK CAA were enlightened enough to allow these two activities by the same organisation at the same time. Of course, we prefer ARCs to be eliminated, but if they sadly do continue, then the rest of EASA states should be allowed to use this alleviation.
response	

comment	*49* comment by: *BBAC British Balloon and Airship Club (UK)* **Possibility for independent certifying staff to perform the airworthiness review and issue the corresponding ARC at the same time they perform the annual inspection contained in the maintenance programme (applicable to sailplanes, balloons, hot-air airships and ELA1**

aeroplanes operated under Part-NCO rules).

BBAC: This is vigorously supported. This has been the approved practice (for CAMOs) in UK since the start of Part M, for balloons. Since there is no difference whatsoever between the "inspection" and "survey" activities, UK CAA were enlightened enough to allow these two activities by the same organisation at the same time. This would under Part ML also extend to work by MOs and by individual independent certifying staff. Of course, we prefer ARCS to be eliminated, but if they sadly do continue, then the rest of EASA states should be allowed to use this alleviation.

response

comment *100* comment by: *Phil Dunnington*

The ability of appropriately-approved staff, whether or not within a CAMO, to perform inspections and airworthiness is a proportionate relief which has no measurable effect on safety over many years of such practice. Although the ARC should be made unnecessary, such inspectors should still be able to sign both elements of a CRS which includes Review.

response

comment *149* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden*

Independent certifying staff to perform AR and issue the ARC: IAOPA and all its subdivisions strongly encourages this restriction to be changed up to ELA2. The unlikely increase in complexity in weight difference is not enough to hold this back. As discussed previously when talking about the small amount of additional aircraft that is only ELA2 and not ELA1, the positive effects of this change would be substantial whilst a decrease in flight safety is not to be expected.

response

comment *164* comment by: *DE LOOF JEAN PIERRE*

Independent certifying staff should have the knowledge of the part ML and enough practices to achieve airworthiness review and deliver ARC.
This could be obtained through proper training by CAMO.

Procedure for competent authorities
ML. B 303 is similar to MB 303 - Does this means that any certifying staff can be controlled by NAA ?

response

comment *233* comment by: *CAA-NL*

Page 16 of 77, independent certifying staff performing the AR.
This comment relates to independent certifying staff performing the Airworthiness Review

(AR). The Netherlands does agree that the Part 66 can obtain his knowledge through various ways, bud we think that this is still a privilege to be given by the Competent Authority (CA) after a successful assessment by the CA or based on a recommendation by the AR staff of a approved organisation with the AR privilege. We need a quick introduction of the Part 66 light licences for the cases where the Part 66 licence does not exists yet. It would also be clear for all during oversight or for potential customers when this privilege was added on the Part 66 licence itself.

In addition to this we still do not agree with the fact that the maintenance and certification privileges of individual Part 66 certifying staff, contracted by the controlling CAMO, are still not accepted in relation with the extension of the ARC by a CAMO. The individual Part 66 certifying staff is getting privileges to issue an ARC when the airworthiness check is performed by him/her together with the annual inspection, without any control of a CAMO so in fact there is no *re*view at all. But when a controlling CAMO is contracting that same Part 66 certifying staff to perform a simple replacement of a part than this work leads to the situation that there must be a full review of all the work done in that year instead of a simple extension of the ARC by the CAMO. Since the possibility that an individual part 66 is trusted enough to issue an ARC without any third party reviewing it we suggest to have the work performed by a individual part 66 not to have any influence on the three year period of an ARC issued by a CAMO.

response

comment *311* comment by: *Jos TREHERN*

Re: 3. Alleviations related to airworthiness reviews
Building upon the alleviations already introduced during Phase I of the 'Part-M General Aviation Task Force', the following alleviations have been proposed:
- Possibility for a Part 145 or M.A. Subpart F maintenance organisation to perform the airworthiness review and issue the corresponding ARC at the same time they perform the annual inspection contained in the maintenance programme (applicable to all aircraft and operations affected by Part-ML).

This is supported. In ballooning, it actually reflects what we have been doing over the last 7-8 years in the UK CAMOs (annual inspection and ARC survey by the same person at the same time). However, there is a strong preference for the ARC to be abolished.

response

comment *312* comment by: *Jos TREHERN*

Re: 3. Alleviations related to airworthiness reviews
Building upon the alleviations already introduced during Phase I of the 'Part-M General Aviation Task Force', the following alleviations have been proposed:
- Possibility for independent certifying staff to perform the airworthiness review and issue the corresponding ARC at the same time they perform the annual inspection contained in the maintenance programme (applicable to sailplanes, balloons, hot-air airships and ELA1 aeroplanes operated under Part-NCO rules).

	This is supported, however I would prefer to see the ARC abolished.
response	

comment	*325* comment by: *The Norwegian Air Sports Federation* The possibility for independent certifying staff to perform AR and issue the ARC should be extended to ELA-2, please see earlier comment.
response	

comment	*349* comment by: *Howard Torode* Comment by European Gliding Union *Alleviations related to airworthiness reviews* Strongly supported, but as an element of a wider ranging review considering simple proposals for all organisations inc. NAA's and approved sporting organisations, 'Qualified Entities' and contractors and individuals, and their rolesin a simplified and integrated maintenance/CA function for ligt sport and GA aircraft.
response	

comment	*384* comment by: *BGA* **Segment description 2.4 Overview of proposed amendments Page 16-17** *3). Alleviations related to airworthiness reviews* Strongly supported, but as an element of a wider ranging review considering simple, wide ranging approvals for all organisations (inc. NAA's and approved sporting organisations,'Qualified Entities, contractors) and individuals, and their role in a simplified and integrated maintenance/CA function for light sport and GA aircraft.
response	

comment	*464* comment by: *flyingadverts* Balloon inspectors are the most qualified and knowledgeable on specific balloons and are best placed to complete both the physical inspection and complete the paperwork review This should still be able to be complete by the same person on the same CRS and best combined. To reiterate balloons are VERY simple aircraft
response	

comment	*473* comment by: *Cary Crawley* In my opinion, this convenience should not be at the cost of retaining an identifiable controlled environment and the use of traceable approved parts during maintenance .

response

comment *536* comment by: *Cameron Balloons Ltd*

This makes total sense. To have the survey, airworthiness review and the maintenance inspection done at the same time by the same person is the most sensible way to do this. It saves extra costs of having a different inspector do the survey.

Inspectors carrying out the should be part of a controlling body, that allows records to be kept and inspection/survey perfomance monitored.

response

comment *553* comment by: *GIPAG France (French General Aviation Operators Professional Union)*

The GIPAG France agrees to combine the annual visit with the ARC **ONLY** for approved frameworks. But giving the same privileging to independent mechanics, it will go against General Aviation SMEs and against all the work GIPAG France and ECOGAS have done and continue to do. It is mandatory today to focus on the European Air Transport level-playing field and to achieve a rise of the level of safety.
GIPAG France wants and agrees to combine the annual visit with the ARC. And if the aircraft is maintained in approved framework and monitored by a CAMO, the aircraft will be exempted from CEN extension and from the review of airworthiness. The aircraft airworthiness will be ensured by the annual visit.
It has been pointed out also that requiring independence or overall authority from the continuing airworthiness of the aircraft concerned may be too demanding for small organisations:
- The mechanic will only have overall authority if he is the owner of the aircraft (for aircraft not managed by CAMOs);
- The cases where the maintenance organisation performs airworthiness management tasks for the owner are frequent and independence is difficult to achieve within small organisations (for example: one man organisation).

response

comment *578* comment by: *Colin Wolstenholme*

re 3

It makes completee sense for the annual inspection and ARC survey to be issued by the same person at the same time, it is how it has been manged in the UK for CAMOs for the last few years.Like the rest of the UK balloonists I still think the ARC is not necesssary.

response

comment *580* comment by: *Colin Wolstenholme*

re 3

as per my previous comment, yes please - and remove the need for an ARC

response

comment *610* comment by: *FNAM (French Aviation Industry Federation)*

The FNAM agrees to combine the annual visit with the ARC **ONLY** for approved frameworks. But giving the same privileging to independent mechanics, it will go against General Aviation SMEs and against all the work FNAM and ECOGAS have done and continue to do. It is mandatory today to focus on the European Air Transport level-playing field and to achieve a rise of the level of safety.
FNAM wants and agrees to combine the annual visit with the ARC. And if the aircraft is maintained in approved framework and monitored by a CAMO, the aircraft will be exempted from CEN extension and from the review of airworthiness. The aircraft airworthiness will be ensured by the annual visit.
It has been pointed out also that requiring independence or overall authority from the continuing airworthiness of the aircraft concerned may be too demanding for small organisations:
- The mechanic will only have overall authority if he is the owner of the aircraft (for aircraft not managed by CAMOs);
- The cases where the maintenance organisation performs airworthiness management tasks for the owner are frequent and independence is difficult to achieve within small organisations (for example: one man organisation).

response

comment *633* comment by: *René Meier, Europe Air Sports*

3. Alleviations related to airworthiness reviews
For those cases…
Page 17
Remark:
An appropriate set of licences was developed, the B2L and the L Licence, we contributed to its createin and eagerly wait for its putting into force.

Rationale:
The Agency's "Ooinion" on that topic was published a while ago. These licences best fit the sports and recreational aviations maintenance needs, are of a flexible structure and are adaptable to the needs of the persons and the organisations involved.

response

comment *709* comment by: *Quality Manager Easy Balloons Ltd*

3. Alleviations related to airworthiness reviews
Building upon the alleviations already introduced during Phase I of the 'Part-M General Aviation Task Force', the following alleviations have been proposed: Possibility for a Part 145 or M.A. Subpart F maintenance organisation to perform the airworthiness review and issue the corresponding ARC at the same time they perform the annual inspection contained in the maintenance programme (applicable to all aircraft and operations affected by Part-ML).

This is agreed it is what happened before EASA and is how we currently operate with respect

	to privately operated balloons.
response	

comment	*710* comment by: *Quality Manager Easy Balloons Ltd* 3. Alleviations related to airworthiness reviews Building upon the alleviations already introduced during Phase I of the 'Part-M General Aviation Task Force', the following alleviations have been proposed: Possibility for independent certifying staff to perform the airworthiness review and issue the corresponding ARC at the same time they perform the annual inspection contained in the maintenance programme (applicable to sailplanes, balloons, hot-air airships and ELA1 aeroplanes operated under Part-NCO rules). I'm not quite sure what is meant by 'Independent certifying staff'. Will this mean that individuals will have to reach a standard before being approved or licensed by the NAA to issue an ARC (if they are retained)? You would have to take into account the possible cost implications for individual and the and the burden on the NAA. There is a likelihood it will affect established businesses.
response	

2. Explanatory Note — 2.4. Overview of the proposed amendments — 4. Alleviations related to the deferment of defects p. 17

comment	*475* comment by: *Cary Crawley* Pilot maintenance knowledge and integrity are required here- which might introduce a greater degree of instruction and auditing.
response	

comment	*554* comment by: *GIPAG France (French General Aviation Operators Professional Union)* The GIPAG France thinks that the notion « available » in ML.A.403 (3) is too light. EASA must find another term or explain it before any safety issues happened.
response	

comment	*612* comment by: *FNAM (French Aviation Industry Federation)* The FNAM thinks that the notion « available » in ML.A.403 (3) is too light. EASA must find another term or explain it before any safety issues happened.
response	

2. Explanatory Note — 2.4. Overview of the proposed amendments — 5. Guidance for TBO extensions (and other deviations from the DAH's recommendations) p. 17

comment	*250* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016* The owner/operator will be responsible if he follows TBOs or not. He will check affected parts, if they need a TBO. By the way: TBO's of different parts were defined by the DAH's decades ago. There are no, and absoluty no, field data for these parts to extent a defined TBO (e.g. Weibull calculation), because they have no customer feedback and doen't know how many parts are in use. After leaving a warrenty period, the DAH is absoluty not interested in his product. For ELA1 and ELA2 aircrafts the costs will be too high to calculate or to define a new TBO. For a may million € aircraft this will be different. Here he can earn a lot of money with continuous field data, but no impact for a safer aircraft.
response	

comment	*324* comment by: *The Norwegian Air Sports Federation* Please refer to our comment #320.
response	

comment	*334* comment by: *WESERTRAINER FLIGHT TRAINING* **TBO versus Reliabillity Centered Maintenance (RCM) / Trend Monitoring / On-Condition-Maintenance** EASA should become the leading player in introducing the concepts of RCM to the lighter end of General Aviation. The concepts of preventive maintenance have been retired in the Airline-Industry decades ago. Only the lighter end of aviation, especially the segment of piston powered owner-flown aircraft, are still holding on this fossil concept of maintenance. Mike Bush, EAA Maintenance expert summarizes: "Despite an overwhelming body of scientific research demonstration that time-based preventive maintenance is counterproductive, worthless, unncessary, and incredibly costly, we're still doing it. Why ? Mostly, I think, because of the fear of litigation. Manufactures are afraid to change anything for fear of being sued (because if they change anything, it could be constructed to mean that what they were doing before was wrong). Shops and mechanics are afraid to deviate from what the manufacturer recommend for fear of being sued (because they deviated from manufacturers' guidance). Let's face it: Neither the manufacturers nor the maintainers have a real incentive to change. The cost of doing all this counterproductive, worthless, unnecessary, and wasteful preventive maintenance (that actually doesn't prevent anything) is not coming out of their pockets, it's going into their pockets!"

Manifesto, A Revolutionary Approach to General Aviation Maintenance, Michael (Mike) Bush, Las Vegas, Nevada, USA 2014

The vast majority of the worlds certifyed light GA fleet aircraft have been produced by US-manufacturers. US product liability law is different from european law, the garanteed amounts in law-suits are enormous. Manufactures will do everything to stay legally untouchable by limitations published in "Instructions for Continous Airworthiness" as recommendations, informations or mandatory instructions (not to be confused with authority approved instructions of the ALS section or content of ADs).

On the other hand overhaul or exchance of airworthy, healty components and parts is a considerable part of the industrys' business income in a drecreasing market for new small certified single engine aircraft.

From this point of view it's hopeless to belive that manufaturers will be proactive to change to a RCM based system in GA.

We have to remember also in the Airline-Industry RCM has been developed and established by the Airlines, not by the aircraft manufacturers.

But private operators are much less powerful than the Airlines to force changes. Under todays regulations, manufacturers (DAH) have things firmly under control.

I would like to urge EASA to change it's mindset of "deviations from manufacturer recommendations under full responsibility of owner" and go ahead towards a safer, more effective and more economic RCM based approach and let RCM become the standard also in small GA-Aircraft maintenance.

One example for counterproductive regulations:

In Germany running engines beyond TBO in aircraft used for flight training is prohibited (By special authority approval after engine inspection, an extention of TBO of very few hours is possible)

For safety reasons the engine is retired at the point of nearly the lowest likelihood of failure in service.

Thanks to that requirement its very likely that an inexperienced student-pilot will have the controls in his/her hand during the time of the highest likelihood of engine failure the statistic shows, during the initial 200 hours following the overhaul - the phase of engine infant mortality.

Scheduled preventive maintenance at the wrong time while ignoring the statistics and against better knowledge results in decreasing safety and increasing costs. A counterproductive relation !

I spent a lot of time to discuss this issue with the german authority without any success. Old-fashioned rules seem to be much more important than real life flight safety aspects !

It's time to make a change.

response

comment *425* comment by: *FAA*

Page 17
Section:
AMC ML.A.302(c) introduces guidance to be considered when evaluating possible deviations from the DAH's recommendations. This guidance takes a risk-based approach, considering aspects such as the operation of the aircraft, the type of aircraft, the hours/years in service, compensating measures, maintenance regime, etc.

Comment:
As part of this process, will EASA develop additional guidance aimed at helping pilots to understand risk-based methods, at a conceptual level, as well as the specific risk-based methodology and process used for evaluating deviations? The FAA recommends such guidance include specific case studies to demonstrate the application of a risk-based approach.

response

comment *426* comment by: *FAA*

Section:
This information may be useful for CAMOs and competent authorities when developing and approving maintenance programmes. It may also be useful for the owner in order to take an informed decision before introducing deviations from the DAH's recommendations. Nevertheless, as allowed by ML.A.302(c)6 and explained in GM ML.A.302, when the owner issues a declaration for the maintenance programme, he/she does not need to justify such deviations.

Comment:
The maintenance program should include the DAH's recommendations. When the owner adds to the program without subtracting with deviations, justification should not be required. This would ensure adequate safety has been addressed.

response

comment *556* comment by: *GIPAG France (French General Aviation Operators Professional Union)*

The responsibilities for an association and corporate body (defined as non-commercial operator and main user of ELA1) to issue a declaration of the TBO extension are not clear. It has to be specified who is responsible and under which procedures the decisions are made.
In addition, GIPAG France do not agree with the fact that the owner can issue a declaration for his/her own aircraft's MP which would be non-approved by the authority. This responsibility for the owner is not appropriate and it would bring a considerable negative impact for the safety of the activity of the ELA1 aircraft not involved in commercial aircraft.

To finish, GIPAG France finds an inconsistency about the TBO extension. This NPA indicates that, for ELA1 and ELA2, the TBO can be extended (without actual justification) while the document G41-11 indicates otherwise and concerns **all aircraft**. EASA must clarify that point.

response

comment *613* comment by: *FNAM (French Aviation Industry Federation)*

The responsibilities for an association and corporate body (defined as non-commercial operator and main user of ELA1) to issue a declaration of the TBO extension are not clear. It has to be specified who is responsible and under which procedures the decisions are made.
In addition, FNAM do not agree with the fact that the owner can issue a declaration for his/her own aircraft's MP which would be non-approved by the authority. This responsibility for the owner is not appropriate and it would bring a considerable negative impact for the safety of the activity of the ELA1 aircraft not involved in commercial aircraft.
To finish, FNAM finds an inconsistency about the TBO extension. This NPA indicates that, for ELA1 and ELA2, the TBO can be extended (without actual justification) while the document G41-11 indicates otherwise and concerns **all aircraft**. EASA must clarify that point.

response

comment *634* comment by: *René Meier, Europe Air Sports*

5. Guidance for TBO extensions
Page 17
Remark:
TBO extensions definitely is a "hot spot", we have to bring this never-ending story to an end, at last. We appreciate that the Agency emphasises that the owner does not need to justify deviations to type certificate holders' maintenance recommendations, and we welcome the risk-based approach to the final solution.

Rationale:
Recommendations are recommendations, not more, not less, they never were meant to be hard law, Jules Kneepkens said a long time ago.

response

comment *694* comment by: *European Sailplane Manufacturers*

As commented to the regarding AMC material we (the manufacturers) have of course an ambivalent position to TBO deviations by the owner.

On one hand we agree that in the end the owner should be able to take the full responsibility to deviate from recommendations - we have clearly expressed this also during our participation in the Part-M task force and in our comments for this and other NPA´s.

On the other hand we have written these recommendations with good reason - often it simply would be technically much better for the aircraft and the systems to follow the recommendations and in some cases real safety concerns are the reason.
Of course they are recommendations only (in the case of direct safety concerns a real

limitation would would be written into the maintenance data / continuing airworthiness instructions).

Therefore we would like to see two things better worded in the AMC material:

A) To clearly express that the option does exist to deviate from TBO´s and other recommendations, but only if the owner is aware that from this point on he takes the responsibility.

B) To explain that it is a good idea to list all deviations in order to know where from now on owner responsibility does exist and to allow for a better understanding and risk analysis of these decisions.

We furthermore would very much like to see according AMC wording in the (today already implemented) Part-M paragraphs which allow similar decisions of the owner even today for ELA1 and non-commercial operations for clarification.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.1. Changes to Regulation (EU) No 1321/2014 p. 18

comment *234* comment by: *CAA-NL*

Cover regulation
When Part ML may be applicable to all kind of operations/operators including licensed air carriers according to 1008/2008 then the cover regulation as it will be with the latest amendment of 1321/2014 will need to be brought in line with ML.A.201(c).
With the introduction of Part ML and the possibilities for owners to choose between Part M or Part ML, the related changes made to Part M with regulation 1088/2015 limited to ELA1 not used for commercial operations should then be deleted again from Part M. It should not be possible to state to follow Part M while using all the current alleviations for a ELA1 aircraft and thus actually complying with the standards of ML but suggesting to comply with the full set of rules.
So in principle we suggest to delete all current alleviations for ELA1 from Part M and have Part ML applicable for ELA2 and small helicopters and all aircraft above have to follow Part M. We suggest the following text:
4. By derogation from paragraphs 1 and 2:
a) ELA2 aircraft.
b) rotorcraft certified for a maximum of up to 4 occupants and up to 1 200 kg MTOM
shall comply with Annex VI (Part-ML)

response

comment *251* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016*

Continuing airworthiness requirements must be defined like in the automotive industry.
A biannual inspection, certyfication, no paperwork is needed of a complex car like MB or BMW needs about 20 minutes incl. payment!

	A annual inspection, certyfication and paperwork of a sailplane (these are aircrafts without an engine, control computers, etc.) needs about one working day. You see the difference?
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.2. Changes to Annex I (Part-M) to Regulation (EU) No 1321/2014 p. 18-20

comment	*50* comment by: *BBAC British Balloon and Airship Club (UK)* BBAC: We submit that a competent formatter should be used to ensure this document is limited to a single page of A4
response	

comment	*150* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden* This template should be easily available as an editable PDF or word-template on EASAs website.
response	

comment	*216* comment by: *Allie Dunnington* All of the contents in these paragraphs could be strung together into one single page.
response	

comment	*252* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016* Will be this your main problem? A new paper? A stamp and signature in the logbook is enough.
response	

comment	*263* comment by: *UK CAA* **Page No:** 19-20 **Paragraph No:** Appendix III – Airworthiness Review Certificate – EASA Form 15; EASA Form 15c Issue 2 **Comment:** The proposed Form 15c has grown in size with the addition of extra text that is not necessary. Reference to whether the review was conducted in accordance with Part M or Part ML is not needed, as the review is always performed in accordance with M.A.710. As is the validity extension process, when permitted. The contents of the Airworthiness Review Certificate should be as simple as possible, as it is

simply a statement that an aircraft was deemed airworthy at a particular moment in time. Simplifying its contents will provide a much clearer and more easily understood certificate. The current Form 15b is sufficient for use where the airworthiness review has been completed by an organisation other than the Competent Authority. The Form 15b could be amended to include the Name and Part 66 licence number of the certifying staff issuing an ARC. This would then remove the need for a Form 15c.

Justification: Simplification

Proposed Text: Delete Form 15c and amend the Form 15b

response

comment *296* comment by: *Luftfahrt-Bundesamt*

Additional detailed comments on certain paragraphs
Besides the need for a rework of the proposal along the general comments stated above, there are some specific remarks concerning the proposed detailed text from our review:

Changes to Part-M, EASA Forms 15:
It would be helpful to include in the ARC reference to the applicable AMP as this is actually the basis for the airworthiness review.

response

comment *313* comment by: *Jos TREHERN*

The Airworthiness Review Certificate should be adapted to fit on a single A4 page.

response

comment *409* comment by: *Swedish Transport Agency*

EASA Form 15c
The proposal to have the EASA Form 15c for all affected aircrafts is useful and clearer for all involved in the process.

STA propose to include a field for the main location for the aircraft on the ARC.

- It can help the authority for the surveillance planning activities.

response

comment *465* comment by: *flyingadverts*

This is unnecessary for balloons as very simple aircraft
If this is unfortunatey allowed to continue, any documentation required to be attached to a logbook or carried in flight should be logbook sized otherwise it is not fit for purpose and a seperate piece of paper for a review is un-necessary and has no safety benefits for balloons

response

comment	*494* comment by: *Belgian CAA* 1. Appendix III (EASA Form 15): a) The usage of the proposed EASA Form 15c Issue 2 is not clear. Indeed, the new EASA Form 15c issue 2 is intended to be used by the CAA's, CAMOs, Part-145, and Part-M Subpart-F for aircraft whose continuing airworthiness is assured in accordance with Part M or with Part-ML. In the same time, we still have the forms 15a and 15b used for aircraft whose continuing airworthiness is ensured in accordance with Part-M (EASA Form 15a for the CAA and EASA Form 15b for CAMOs/independent certifying staff). Nothing in the light Part-M prevents the CAA authority from issuing an EASA Form 15a (for ELA2 aircraft & rotorcraft certified for up to 4 occupants and up to 1200 kg) whose continuing airworthiness is ensured in accordance with Part-M. Similarly, a CAMO may still issue an EASA Form 15 (b) if the continuing airworthiness is ensured in accordance with Part-M. It should be clarified in Part-M that EASA Form 15a and 15b cannot be used for ELA2 and rotorcraft certified up to 4 occupants and up to 1200 kg. b) On the proposed EASA Form 15 c, reference to M.A.901 (b)(3) is wrong: it should be M.A.901 (b) 4 c) There seems to be a conflict between MLA.901 and M.A.901 (l) for the form 15c. M.A.901 states that the form is only for maintenance organization.
response	

comment	*520* comment by: *European Balloon Federation* It is noted that the ARC15c example now spreads over more than a single page. Appropriate formatting and the removal of unrequired options should ensure that it returns to a single A4 page and it is noted that NAAs currently accept variations in the format of the ARC15b; however, for the avoidance of doubt, perhaps EASA could consider adding some AMC advice to make clear that some reformatting and removal of inappropriate options is acceptable.
response	

comment	*537* comment by: *Cameron Balloons Ltd* The ARC and the CRS need to be one document, these must be on one side of paper so they can be inserted into the balloon log book.
response	

comment	*573* comment by: *Irish Aviation Authority* EASA Form 15C tick box "Certifying staff holding a Part-66 licence" may not be an accurate description in all cases. It is suggested that this should read "Certifying staff holding an appropriate licence in compliance with Annex III (Part 66) or a nationally recognised maintenance personnel qualification appropriate to the aircraft category (when Article 5(6) refers to national rules) of 1321/2014, as amended."
response	

comment	*576* comment by: *Irish Aviation Authority* It may not be clear to the aircraft owner that an ARC issued by certifying staff holding a nationally recognised maintenance personnel qualification, is not mutually recognised for transfer of that aircraft between Member States' registers. It is suggested that EASA Form 15c be amended to indicate to the owner if the ARC does not benefit from mutual recognition when the aircraft is transferred to another Member State's register. This limitation should be made very clear to the aircraft owner.
response	

comment	*581* comment by: *Colin Wolstenholme* why not make this one page??
response	

comment	*647* comment by: *DGAC France* DGAC France wants to highlight a responsibility problem for an organisation during an airworthiness review on an aircraft for which the maintenance programme is declared by the owner. The French civil legislation indicates that the professional belonging to an organisation (who is supposed to be the specialist) is always responsible facing the owner who is considered as a layman, although, in this case, he/she has defined the maintenance programme. A solution could be to find a formulation on the certificate more accurate than “this aircraft is considered Airworthy at the time of the review” (which implies that everything has been checked) so that it does not give more responsibilities than the ones linked to the real work or the checks performed by the organisation that signs the document.
response	

comment	*711* comment by: *Quality Manager Easy Balloons Ltd* Revised Form 15 This is amazing in that there you are telling us how much simpler you want o make things and the ARC goes from a simple single page to a two pager multi-choice nightmare. Surely if the ARC has to remain and it is going to be part of the Release then why this? Disagree

	strongly.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — Contents p. 21-22

comment	*652* comment by: *René Meier, Europe Air Sports* Page 22, for Appendix I Remark: "Limited" to be deleted throughout the entire document, please! Rationale: "Pilot-owner maintenance" sounds much better.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.1 General p. 22-23

comment	*2* comment by: *Guillaume SUDRE* Lack of "Flight time" definition for maintenance. Today, the UK CAA (just like the FAA) takes into account **airborne time** regarding aircraft maintenance. However, some other CAA (for instance, the french DGAC) only accept **block to block time.** Please provide standardisation.
response	

comment	*235* comment by: *CAA-NL* **M.1 General** · For clarity we suggest to use the first line of numbering for: (a) definitions and acronyms, (b)Applicability and (c) Competent Authority. · (f) DAH, please clarify that this is not just the TC holder of the aircraft, but also the DAH for STC's etc. that are incorporated in the aircraft. · Also in the last item (b) the words 'State of the Operator' are used in line with the ICAO annex 6 definitions. However in the ML.1(i) definition above this text the operator is just one specific category of the possible owners. This suggest that for the other two categories this is not possible. We suggest to use the words 'State of the **Owner'**. Further the possibility of a CAMO being used from a state different than the SoR and the SoO as introduced with 1536/2015, has not been included here.
response	

comment *264* comment by: *UK CAA*

Page No: 22

Paragraph No: ML.1 General

Comment: ML.1 specifies a DAH as a 'Design Approval Holder'. However it does not provide a further definition.

Justification: For clarity.

Proposed Text: Expand definition to read:

"Design Approval Holder means the Type Certificate Holder, Supplementary Type Certificate Holder and any other organisation that may publish design data in accordance with Part 21."

response

comment *327* comment by: *The Norwegian Air Sports Federation*

ML.1 ("For the purpose of this part...")

(a)/(b): Replace "authority" with "authority or entity"

Rationale: Qualified entities may in the future be a suitable structure for air sport federations, which in turn can perform tasks for the lighter end of GA on behalf of the authority.

(b): NLF believes the approval of the AMP should always stay with the same member state as the state responsible for the oversight of the continuing airworthiness of the relevant aircraft (state of registry). The AMP is in our view not an operational document – it is a maintenance document. Secondly, if the ARC and the AMP are tied to two different authorities with different interpretations of Part-ML (not such an unlikely scenario!), it will lead to immense problems, consuming time, efforts and costs.

response

comment *332* comment by: *CAA Finland*

ML.1 General (i) (2) is unclear in case of wet-lease or multioperation. Formulation of M.A.201(b) is better.

response

comment *460* comment by: *Hermann Spring*

Layout and readability of Part-ML
The maintenance staff is the process owner of the Part-ML activities and this fact should be much more considered, when new documents are developed. Part-ML should be written in manner, that maintenance staff like it, if it is layout a useful tool, which support them to keep the aircraft in a safe condition.

My colleagues maintaining our ELA1 and ELA2 aircraft refused to read and to comment NPA 2015-08 it was classified by them as to complicated.
I do not agree, but I understand their objections, which are based on the negative experiences with Part-M application for the low end of the General Aviation (ELA1 & ELA2).
The aim must be to keep it simple and easy readable by the main user of these documents.
What should be avoided or specially considered?
Any kind of frustration would have a negative impact to the process. Too expanded Regulations, and a lot of rules are creating demotivation and this would result in minimizing the overall and safety attention of the maintenance staff.
The structure should be improved. Basic considerations and the aim of the regulation should be explained at the begin in a motivating manner.
Such an approach would compensate for sentences like in ML.A.801 g
A CRS shall not be issued in the case of any known non-compliance which endangers flight safety.
Do **not list the no-goes,** remain on the positive side with how-to-do. Overloading with too much information shall be avoided (reduced to maximum efficiency).
Keep documents short, start with the basics (Maximum 10) and show the benefit of its purpose.

response

comment *495* comment by: *Belgian CAA*

1. ML.1 (§ b) (For the purpose of this part…. For the approval of the AMP) : it could be more appropriate to state that the approval of the AMP must be agreed by the Member State of registry like it is written in the Part-M M.1 (§4).

Indeed, It is the MS of registry who is the first responsible for the AMP and not the MS of operator. As it is written ML.1, the MS operator seems to be the first responsible.

response

comment *654* comment by: *René Meier, Europe Air Sports*

ML.1
Page 23
(M) Part-21: "Amended by…." should be added for clarity reasons, we think.

Question:
Are there not amendments to be added?

response

comment *655* comment by: *René Meier, Europe Air Sports*

ML.1 General
Page 23
This Part applies to...
Remark:

Please make clear also here that ELA1 aircraft are included.

Rationale:
For clarity reasons and for easy understanding the provisions.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.101 Scope p. 23

comment *265* comment by: *UK CAA*

Page No: 23

Paragraph No: ML.A.101 and M.A.101

Comment: It is recommended that paragraph ML.A.101 is amended as proposed below. In addition it is suggested that the same amendment is made to Part M paragraph M.A.101.

Justification: Clarity and readability.

Proposed text: Replace paragraph ML.A.101 with the following:

"This Section establishes the measures to be taken to ensure that aircraft remain airworthy and are appropriately maintained. It also specifies the conditions to be met by the persons or organisations involved in such continuing airworthiness management"

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.201 Responsibilities p. 24

comment *169* comment by: *Transport Malta Civil Aviation Directorate*

It is recommended that the Regulation stipulates that the owner makes a formal declaration to the competent authoritythat we can discharge the continuing airworthiness responsibility.

response

comment *290* comment by: *Luftfahrt-Bundesamt*

ML.A.201
A paragraph similar to M.A.201 (b) is missing. There are in many cases also owner/lessee (operator) constellations (in Germany provided in the registration documentation) for GA aircraft that would require the same statement as in M.A.201(b) to allow for transfer of responsibility to the lessee (operator).

response

comment	*369* comment by: *CAA Finland* Commission Regulation(EU) No 965/2012 Article 5. Air operations point 5. Training organisations… (b) … Annex VII (NCO) is not in line with ML.A.201 (c). "Commercial" ATOs may operate without CAMO and maintenance organization.
response	

comment	*410* comment by: *Swedish Transport Agency* ML.A.201(d) Maybe it will be necessary to amend the Appendix I (*Continuing airworthiness management contract*) to include references to ML.A.x and Part-ML also.
response	

comment	*521* comment by: *European Balloon Federation* ML.A.201(c) EBF welcomes the use of the reference to part NCO to address the determination of commercial operations
response	

comment	*557* comment by: *GIPAG France (French General Aviation Operators Professional Union)* The responsibilities for an association and corporate body (defined as non-commercial operator and main user of ELA1) to issue a declaration of the TBO extension are not clear. It has to be specified who is responsible and under which procedures the decisions are made. In addition to this comment, the GIPAG France do not agree with the fact that the owner can issue a declaration for his/her own aircraft's MP which would be non-approved by the authority. This responsibility for the owner is not appropriate and he/she does not have the knowledge and it would bring a considerable negative impact for the safety of the activity of the ELA1 aircraft not involved in commercial aircraft. EASA has to specify the condition where the owner, who does not have the sufficient knowledge, can assess the airworthiness of the aircraft. Indeed, with the French law (L111-2 of the French Consumption Code), when an incident occurs, the mechanic / CAMO will be judged wrong against the owner. The GIPAG asks EASA to take into account this specificity when writing ML.A.201 so that all Part-66 / CAMO can be covered in case of litigation. In general, this NPA allows the owner to define its own maintenance program, postpone TBO as well as tasks. What skills does the owner have legitimate for taking such decisions? Does the owner have to subscribe to all whole known technical documentation and all their evolutions as approved frameworks do? How is he/she aware of the CN and AD? GIPAG France, as professionals, cannot accept that such privileges are granted to them. This goes against security, and raises the problem of responsibility. It is an approved framework who will do the maintenance so the framework will be the one called into question in the event of accident and not the owner.

GIPAG asks EASA to clearly specify that if the owner is not able to/cannot prove that he/she has all the elements allowing to establish the MP, the owner must contract and work with a CAMO. Or as a second solution, EASA must make sure that the owner is responsible for all actions, tasks and make him/her able to sign him/herself release certificate on maintenance documents.

response

comment *614* comment by: *FNAM (French Aviation Industry Federation)*

The responsibilities for an association and corporate body (defined as non-commercial operator and main user of ELA1) to issue a declaration of the TBO extension are not clear. It has to be specified who is responsible and under which procedures the decisions are made.
In addition to this comment, the FNAM do not agree with the fact that the owner can issue a declaration for his/her own aircraft's MP which would be non-approved by the authority. This responsibility for the owner is not appropriate and he/she does not have the knowledge and it would bring a considerable negative impact for the safety of the activity of the ELA1 aircraft not involved in commercial aircraft.
EASA has to specify the condition where the owner, who does not have the sufficient knowledge, can assess the airworthiness of the aircraft. Indeed, with the French law (L111-2 of the French Consumption Code), when an incident occurs, the mechanic / CAMO will be judged wrong against the owner.
The FNAM asks EASA to take into account this specificity when writing ML.A.201 so that all Part-66 / CAMO can be covered in case of litigation.
In general, this NPA allows the owner to define its own maintenance program, postpone TBO as well as tasks. What skills does the owner have legitimate for taking such decisions? Does the owner have to subscribe to all whole known technical documentation and all their evolutions as approved frameworks do? How is he/she aware of the CN and AD?
FNAM, as professionals, cannot accept that such privileges are granted to them. This goes against security, and raises the problem of responsibility. It is an approved framework who will do the maintenance so the framework will be the one called into question in the event of accident and not the owner.
FNAM asks EASA to clearly specify that if the owner is not able to/cannot prove that he/she has all the elements allowing to establish the MP, the owner must contract and work with a CAMO. Or as a second solution, EASA must make sure that the owner is responsible for all actions, tasks and make him/her able to sign him/herself release certificate on maintenance documents.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.202 Occurrence reporting p. 24

comment *237* comment by: *CAA-NL*

ML.A.202 Occurrence Reporting
Please include a reverences to regulations EU 376-2014 and EU 1018-2015 and bring the text in line with these regulations.

response

comment	*427* comment by: *FAA* Section: Occurence Reporting Comment: Has EASA considered the development of a non-punitive voluntary reporting system as a method of gaining more information regarding the efficacy of this initiative? Such a system may not only aid EASA in refining the implementation of this process, but by making de-identified information available to pilots, and additional safety benefit may be realized.
response	

comment	*656* comment by: *René Meier, Europe Air Sports* Occurrence Reporting Page 24 Remark: Delete these provisions here. Rationale: We want to keep all Occurrence Reporting provisions at a strict minimum. This is already regulated by 376/2014 and 2015/1018 (Annex II).
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.301 Continuing airworthiness tasks p. 25

comment	*659* comment by: *René Meier, Europe Air Sports* ML.A.301 Continuing airworthiness Page 25 Remark: The continuing airworthiness is linked to the aircraft only, not emergency equipment and other operational equipment not installed in the aircraft, which or may not be required for a certain flight. Rationale: It is important to distinguish between airworthiness and “operational readiness” for a particular flight. We propose the following change: Remark: We propose “The aircraft continuing airworthiness shall be ensured by”: Rationale: The term “serviceability” is tobe deleted. It translates into “servicefriendliness” in many European languages. We propose “operational readiness”, if needed.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.302 Aircraft maintenance programme p. 25-27

comment

6 comment by: *Guillaume SUDRE*

MLA.302 says *"The AMP shall indicate that it has been developed in accordance with Part-ML and .....*
shall include all the mandatory continuing airworthiness information, such as .... , ***the Airworthiness Limitation Section (ALS)****"*

Last month, the FAA issued a Letter of Interpretation (LOI) to explain how airwothiness limitation should be implemented.
You can find the LOI here : http://www.faa.gov/about/office_org/headquarters_offices/agc/pol_adjudication/agc200/interpretations/data/interps/2015/new-tennessee%20aircraft%20services%20-%20(2015)%20legal%20interpretation.pdf

It says :

- An ALS is part of an aircraft's type design.
- The only version of an ALS that is mandatory is the version that was included in the particular aircraft's type design at the time it was manufactured.
- Only a new Airwithiness directive (AD) may create new "limitation"

Could you confirm this interpretation and state it clearly in AMC/GM ?

response

comment

15 comment by: *Ulrich NIGGLI*

It should be made clear that it's also possible to perform the annual inspection more than 1 month later, if the aircraft is not used in this time. In glider clubs the annual inspection/maintenance is done once a year. Due to the voluntary nature of the clubs, sometimes the annual is done in October and sometimes in March. Between November and February, the sailplane isn't used. This must remain possible, without requiring lots of paperwork (i.e. sending in ARC to NAA etc.).

response

comment

51 comment by: *BBAC British Balloon and Airship Club (UK)*

ML.A.302 Aircraft maintenance programme
(a) The maintenance of each aircraft shall be organised in accordance with an AMP.

BBAC: BR Annex IV, para 6 (a) (iv) says that "the maintenance of the aircraft is performed in accordance with its maintenance programme" this does not rule out the maintenance programme for a balloon being part of the manufacturer's (DAH's) manual, rather than a separate document. A more enabling interpretation of the BRs is required as per Mr Ky.

response

comment *52* comment by: *BBAC British Balloon and Airship Club (UK)*

ML.A.302 Aircraft maintenance programme
(a) The maintenance of each aircraft shall be organised in accordance with an AMP.

BBAC: We submit that AMPs should not be required for balloons. For simple aircraft such as balloons individual maintenance programmes add nothing to safety; they are only a bureaucratic cost which simply calls up the manufacturer's documentation. In a separate "Part Balloons" it should be clearly stated that the manufacturer's documentation should have the force of the AMP without any need for additional documents. Changes to the basic regulations (if genuinely needed) should be sought without delay.

response

comment *80* comment by: *BPvL/AEI*

If the owner wishes, not to follow the manufacturers recommendation and to ensure a minimum of safety, the wording of (c).2 (i) shall read:
If affected item is installed, the AMP shall strictly follow the MIP. No deviations iaw AMC.ML.A.302(c) allowed.
This avoids heavy discussions during AR iaw (c)7 too.

response

comment *101* comment by: *Phil Dunnington*

OEM Maintenance Programme should be sufficient

response

comment *155* comment by: *Ian HEY*

ML.A.302 (c) (7) includes a duty for the person performing the review to inform the competent authority of the Member State in cases of disagreement between reviewing person and the owner. For appropriately formed sporting associations (eg: the British Gliding Association in the UK) it should be specifically stated that this reporting requirement is expected to be delegated by the competent authority to the sporting association.

response

comment *156* comment by: *Ian HEY*

	ML.A.302 (d) (1) The inspection interval tolerance is now explicitly stated as 1 month or 10 hours. Does this mean that the Part M 90 day anticipation period is no longer applicable? If so, this should be made explicit in the wording.
response	

comment	*175* comment by: *Claude Lelaie* **ML.A 302** This maintenance program includes too many conditions and therefore it will not push the owners to deviate from manufacturer program. Why the need of an annual mandatory review? Can be modified if something inappropriate is found. - (d) (2) Difficult to understand what means "Review of weighing records... 965/2012" Should be reworded. - Operational test of transponder is unrealistic. If you have no radar on the airport you cannot do it! Or you need an expensive tool that a lot of approved maintenance organisations do not have. In addition not included in manufacturer inspections. Should be removed. - Engine temperatures on ground? Don't know what that means. Engines are tuned for flight and it is only in flight that you can check the temperatures.
response	

comment	*178* comment by: *Claude Lelaie* **ML.302 (c) (6)**: It is unfortunate that we need to go in the AMC to discover that this sentence may allow a modification of TBO. This paragraph should be reworded with a clear language.
response	

comment	*183* comment by: *Luftsport Verband Bayern / Germany* (c) (3) Does that mean that after the inclusion no new approval is required (in case of CAMO or MO)? If this is the case it should be clearly stated, otherwise the words "once approved or declared in accordance with point (b)" should be deleted.
response	

comment	*184* comment by: *Luftsport Verband Bayern / Germany* (c) (7) last paragraph: This paragraph is more "soft" than the one of the current Part-M. According to M.A.302 (h)(5) the person performing the review has to report discrepancies to the authority regardless if the owner is willing to change the AMP or not. Accoring to the new ML.A.302 (c)(7) the owner may change the AMP to avoid this report. Because both parts M and ML allow the self declaration of an AMP these two paragraphs should apply the same rules -preferably the "soft" version.

response

comment *217* comment by: *Allie Dunnington*

page 25 AMPs:

Balloons are one of the simplest forms of aviation. There are no engines involved, not much technology (that could fail), not many variations of design and not many instruments needed to operate them. They fly slowly and have an extremely good safety record in over 40 years of operations in the UK.

I do therefore believe that individual AMPs are not needed and should not be required for balloons and that the generic MP in the manufacturer's manual is totally acceptable and safe to follow.

I hope that EASA would take a positive view of the basic regulations and should allow progress in alleviating the financial and bureaucratic burden of hot air balloons.

response

comment *238* comment by: *CAA-NL*

ML.A.302.

· (c)(3) The wording 'once approved or declared' give room for interpretation. It could be read that these changes can be made after the approval of declaration is issued. Without anybody taking the responsibility for these changes. Maybe the following words are less open for misunderstanding:
(c)(3) may include additional or alternate instructions proposed by the owner, CAMO or maintenance organisation **under the approval or declaration** in accordance with point (b),

· (c)(5) Please align the words 'Life Limited components' with the terminology as a result of the Technical Records task ((RMT.0276)

· (d)(1) Although we recognise the need for flexibility when planning the 100 hours or annual inspection, and support the tolerance of 10 hours or one month, we prefer the next interval to be calculated as if the maintenance was performed on time. The suggested calculation method makes it possible that after 12 years only 11 annuals or after 1000 hours only 9 times a 100 hours inspections is performed. This is not just flexibility but minimising maintenance below the required minimum. The same comment is valid for AMC M.A.302(d).

response

comment *266* comment by: *UK CAA*

Page No: 25

Paragraph No: ML.A.302(c)4 Aircraft maintenance programme

Comment: Reference is made to mandatory airworthiness limitations published in ICA or TCDS. In a few cases such as the early Beechcraft 200 series, which although not applicable

to ELA1 aircraft, the airworthiness limitations are published in the AFM. Therefore UK CAA recommends that the paragraph is amended as proposed below.

Justification: To ensure that such important information is not missed.

Proposed Text: Amend to read:

"shall include all the mandatory continuing airworthiness information, such as repetitive ADs, Airworthiness Limitation Section (ALS) of the Instructions for Continued Airworthiness (ICA), **retirement lives contained in Aircraft Flight Manual (or Pilot Operating Handbook),** or specific maintenance requirements contained in the Type Certificate Data Sheet (TCDS)"

response

comment *267* comment by: *UK CAA*

Page No: 26

Paragraph No: ML.A.302 (c)(7) last sub-paragraph, Aircraft maintenance programme

Comment: It is not clear in ML.A. 302 (c)(7) who's responsible for making changes to the maintenance programme, in the event that there are discrepancies resulting from deficiencies to the maintenance programme. It is proposed that ML.A.302 (7) should say: 'the person responsible for the AMP **shall amend the AMP accordingly**…'. This would make it clear that the owner has the obligation, or in the event that the owner had entered in to a limited contract to amend the maintenance programme, the CAMO, to revise the contents of the maintenance programme.

Justification: If it is not clear who is responsible for amending the contents of a maintenance programme the required changes may not be made when there are discrepancies.

Proposed Text: Amend last paragraph in ML.A.302 (c)(7) to state:

"… If the review shows discrepancies on the aircraft linked to deficiencies in the content of the AMP, *the person responsible for the AMP shall amend it accordingly."*

response

comment *268* comment by: *UK CAA*

Page No: 26/27

Paragraph No: ML.A302 (d) A 'Minimum Inspection Programme': sub-paragraph (1) ,

Comment: In the first bullet under sub-paragraph (1) it is stated that a tolerance of 1 month or 10 h may be applied to inspection intervals for aeroplanes, Touring Motor Gliders and Balloons.

The second bullet under sub-paragraph (1) states that a tolerance of 1 month may be applied to that interval for sailplanes and powered sailplanes.

There is no mention of an airworthiness review anticipation period within NPA 2015-08. It is obliquely referenced in ML.A.901(b)(3) by way of a reference to M.A.901(l) of Part M.

Given the complication of the proposed text the user of Part M Light might not realise that using the tolerances stated in ML.A.302 might result in an expired ARC. UK CAA propose that the tolerance of 1 month from the annual inspection should be removed and an anticipation period of 30 days to allow for better planning of the annual inspection and ARC should be added. A note is also proposed to ensure that allowable tolerances for scheduled maintenance tasks are not inadvertently applied to mandatory requirements.

Justification: To make it simpler to allow the owner to keep the annual inspection and the ARC aligned and reduce the risk of overrun of mandatory requirements **such as repetitive ADs.**

Proposed Text:

Replace the text under both bullet points under (d)(1) as follows:

"(d) A 'Minimum Inspection Programme':
(1) shall contain the following inspection intervals:
— for aeroplanes, Touring Motor Gliders (TMG) and balloons,. A tolerance of 10 h may be applied to the 100 h interval inspection for non mandatory tasks. The next interval shall be calculated from the time the inspection takes place. (It must be noted that the 10 h tolerance may not be used for any mandatory requirements falling due within 100 h interval);

Add new second bullet point under (d)(1) as follows:

- "The annual inspection can be anticipated by a maximum of 30 days without loss of continuity of the programme, to allow for the annual inspection to take place coincident to the airworthiness review. (It must be noted that using the one month anticipation period may result in mandatory requirements within annual inspection becoming due prior to the next annual inspection)"

response

comment *291* comment by: *Luftfahrt-Bundesamt*

ML.A.302(b)
It remains unclear who exactly is required to approve or declare the AMP under which circumstances. Since it is an enumeration of options the verb would need to be changes to "may" instead of "shall".

response

comment *314* comment by: *Jos TREHERN*

Re: ML.A.302 Aircraft maintenance programme
(a) The maintenance of each aircraft shall be organised in accordance with an AMP.

Balloons are very simple aircraft and consequently individual AMPs are not needed. The

manufacturers provide a generic maintenance programme in their manuals which is completely adequate.

I would very much like to see further progress towards lightning the burden on ballooning and would welcome efforts by EASA to secure liberal interpretations of the Basic Regulations to this end.

response

comment *326* comment by: *The Norwegian Air Sports Federation*

ML.A.302 (d) (2):
What is meant by “servicing tasks”? Is "servicing" understood as "maintenance" or rather simple servicing as checking tire pressure and cleaning windows?

If "servicing tasks" means "maintenance tasks recommended by the DAH", no TBO extensions can really be allowed. This has to be clarified.

response

comment *328* comment by: *The Norwegian Air Sports Federation*

(2)

"Servicing tasks": What is servicing tasks? Please see earlier comment.

"Operational check of transponder": Why is this needed every year? After the cancellation of EASA AD 2006-0265, we see no reasons for a yearly check of any transponder, except when required by any other AD. Please refer to US legislation covering the same subject:

14 CFR 91.413

24 months ought to be sufficient also for Europe.

"Operational check of the pitot-static system": Why is this needed every year, regardless of VFR/IFR operation? Every 24 months should be sufficient, and then only required for IFR operations. Please refer to US legislation covering the same subject:

14 CFR 91.411

response

comment *339* comment by: *WESERTRAINER FLIGHT TRAINING*

Aircraft Maintenance Program- Clear separation of mandatory tasks (4) from non-mandatory tasks (5)

<u>Mandatory Tasks (4)</u>

"Life Limited Components" should be shifted from point (5) to point (4) - mandatory

continuing airworthiness information - to summarize all mandatory requirements under point (4)

Non-Mandatory (additional) Tasks (5)

(5) in addition, shall identify any additional maintenance tasks to be performed because of the specific aircraft type, aircraft configuration and type and specificity of operation. The following elements ~~shall~~ **should** be taken into considerations ~~as a minimum~~

"shall" should be exchanged by "**should"** for a clear unambiguous speech to state following instructions as non-mandatory!

response

comment *347* comment by: *WESERTRAINER FLIGHT TRAINING*

Aircraft Maintenance Programm - Non-mandatory tasks (5) - **Trend Monitoring and Reliability Centered Maintenance (RCM)**

To introduce modern approaches to aircraft maintenance programs the following items should be added to (5)

- Reliability Centered Maintenance (RCM) Strategies and Trend Monitoring Programs

As RCM Strategies are well-known from the Airline-Industry there is no need for further explanations about the benefits of their wider adoption in General Aviation.

response

comment *351* comment by: *Howard Torode*

Comment by European Gliding Union

'The maintenance of each aircraft shall be organised in accordance with an AMP'

General comment - In the case of sailplanes, the simple MIP contained in these proposals can be expected to cover the large majority of aspects. Given that application of AD's are potentially unscheduled and additonal to the MIP, the development and custmisation of sailplane maintenance programmes appears to attract disproportionate attention in Part ML. All that is required here is a simple reconcilliation of the manufacturer's guidance with the MIP to create a widerly applicable overall programme for the majority of dailplane types. If basic regulation (BR) changes are needed to reflect this then amendments should be pursued. Surely this is a detailed maintenance matter that should not be arising at BR level?

response

comment *352* comment by: *Howard Torode*

Comment by Euripean Gliding Union

AMP descrepancies to be reported to the Competent Authority.

While the rationale for this can be appreciated, it is felt that the widespread use of this measure for minor issues would be cumbersome and counterproductive to AMP development. We feel sure this is not what is intended. Recourse to the CA would seem to be necessary only in extreme cases where parties from all sides of a disagreement cannot resolve their differences internally, or require specialised advice. Note that with the wider interpretations likely to occur with 'owner declared' maintenance programmes (as proposed herein) this could precipitate a much larger volume of referrals of 'discrepancies' to CA's.

response

comment *353* comment by: *Howard Torode*

Comment by European Gliding Union

A tolerence of one month or 10 hours may be applied to that inspection interval.

In light sport aviation many nations may currently allow a longer advance tolerance period to enable convenient annual continuity. A more generous advance tolerence (say 90 days) combined with the proposed 30 day, 10hours extension as proposed would recognise the seasonal nature of our sport and the vaired availability of staff or persons with wider working commitments. All tolerances should respect the original CRS/review dates, so that the 'average' interval between reviews is manitanined uneffected. Such tolerences continue to be needed, particularly when maintenance and CA are required to be ocordinated as in PML as proposed.

response

comment *385* comment by: *BGA*

Segment description 3. Proposed amendments MLA.302(a) Page 26

The maintenance of each aircraft shall be organised in accordance with an AMP

In the case of gliders, the simple MIP contained herein can be expected to cover the large majority of aspects. Given that the applicability of AD's are managed additional to the MIP, the development and customisation of sailplane maintenance programmes appears to have attracted disproportionate attention in this Part PML. All that is is required is a simple reconciliation of the manufacturer's guidance with the MIP to create a widely applicable overall programme for the majority of sailplane types. If basic regulation changes are needed to reflect this then they should be pursued. In principle this is a matter of maintenance regulation not BR.

Segment description 3. Proposed amendments MLA.302(c) (7) Page 26

AMP discrepancies to be reported to the Competent Authority (CA).

While the rationale of this can be appreciated, it is felt that the widespread use of this

measure for minor issues would be cumbersome and counterproductive to AMP development. We feel sure this is not what is intended. Recourse to the CA would seem to be necessary only in extreme case where parties from all sides of any disagreement cannot resolve their issues internally.

Segment description 3. Proposed amendments MLA.302(d) (1) Page 26

A tolerance of 1 month or 10hrs may be applied to that (inspection) interval.

In light sport/GA in UK we have, to date, allowed a tolerance period of 90 days (advance only) in order to maintain annual continuity. Applied in advance only, this does not affect the average interval between reviews. This is in respect of the seasonal nature of sport aviation and the availability of staff with wider work commitments. A tolerance continues to be needed particularly when maintenance and CA periods are required to be coordinated.

response

comment *387* comment by: *BGA*

Segment description 3. Proposed amendments MLA.302(d) (1) Page 26

A tolerance of 1 month or 10hrs may be applied to that (inspection) interval.

In light&sport/GA in UK we have, to date, allowed an advance tolerance period of 90 days to enable convenient annual continuity. This advance tolerance period, combined with a 30day/10hour extension (as proposed), should respect the original CRS/review dates, so as not to affect the 'average' interval between reviews. This wider proposal recognises the seasonal nature of sport aviation and the availability of staff with wider work commitments. Such tolerances continue to be needed, particularly when maintenance and CA periods are required to be coordinated as in PML.

response

comment *466* comment by: *flyingadverts*

The MP in the manufacturer's manual is completely suitable and the defining document. sufficient.

Paperwork should be proportional to the aircraft. Balloons are simple aircraft and this level of regulation is completely out of proportion to the safety or utilisation

response

comment *488* comment by: *Luftsport Verband Bayern / Germany*

ML.A.302 (c) (3) allows the owner to use alternate instructions which means that e.g. he can deviate from the TBOs defined by the DAH. In Part-ML this is allowed when being approved by the NAA, CAMO or the owner (ML.A.302 (b)).

In Part-M this seems to be only allowed if being approved by the NAA. Reason: If the DAHs instructions are used according M.A.302 h) 2., M.A.302 d) iii) asks for direkt approval by the

NAA according M.A.302 (b).

There is a difference in handling between Part-M and Part-ML which should be adjusted, preferably to the solution of Part-ML.

response

comment *489* comment by: *Luftsport Verband Bayern / Germany*

In Part-ML ML.A.302 (d) (1) as well as in Part-M M.A.302 (i) (1) a tolerance for the 100h/1 year inspection is applied. In both Parts this tolerance seems only to be allowed when using the Minimum Inspection Programme.

While in PART-ML this deviation may be subsumed under ML.A.302 (c) (3) and therefore being approved by the owner also when using the DAHs instructions, this seems not to be the case in Part-M, because it's not included in M.A.302 h).

This is a difference between Part-M and Part-ML which should be adjusted, preferably to the solution of Part-ML.

response

comment *496* comment by: *Belgian CAA*

1. ML.A.302:
It is stated that the person performing the review should inform the authority if the review shows discrepancies on aircraft linked with deficiencies in the content of the AMP only when he/she doesn't agree with measures undertaken by the owner for correcting the AMP. The BCAA suggests to keep requirement of reporting in this case as currently stated in Part-M M.A.302 (h): for declared AMP always reporting to the CAA if the review shows discrepancies on the aircraft linked to deficiencies in the content of the maintenance programme"

Indeed, it is a safety issue which necessitates a reporting. Furthermore, it is not be clear why for the same subject of declared AMP, the occurrence reporting on this subject should be different depending on whether Part-ML is used or not .

response

comment *497* comment by: *Belgian CAA*

M.A.302: For the content of the AMP, the BCAA suggests to keep the requirement of taking into account the instructions issued by the competent authority

response

comment *498* comment by: *Belgian CAA*

1. ML.A.302 : it could be useful to introduce the fact that a copy of the AMP may be requested by the competent authority when it is not approved directly by the competent authority. This will allow the competent authority to perform review if judged necessary to

	prepare audits, ACAM,…
response	

comment	*499* comment by: *Belgian CAA* 1. ML.A.302 (§ c 6): in case of deviations, it could be useful to have at least the identification of these deviations in the AMP in order to have a clear overview. Currently, ML.A.302(§ c 6) seems not to require the identification of the subject deviations.
response	

comment	*522* comment by: *European Balloon Federation* ML.A.302(b) The approval or declaration of the AMP is an invention of the implementing rules, it is not a requirement of the BR. If the AMP does not need to be approved, then it need not be a separate stand alone document.
response	

comment	*523* comment by: *European Balloon Federation* ML.302 EBF continues to maintain that a separate AMP is not required for balloons, since all the necessary maintenance requirements are contained within the manufacturers/design holders maintenance documentation. Acknowledging that this fact cannot always be guaranteed and that maintenance requirements must be specified, it should be possible to cater for both situations with the introduction of a further clause such as: (e) Notwithstanding the above, in the case of balloons where the DAH or manufacturers documentation contains all the requirements for an AMP within that documentation, then a separate AMP is not required. This may require some further adjustment by the manufacturers to their current documentation, for example to specify requirements for additional items called up by operational rules, but this should be readily achieved
response	

comment	*539* comment by: *Cameron Balloons Ltd* Hot air balloons are very simple aircraft. They do not need individual AMP's. The manufacturers maintenance schedule along with any appropriate supplements will cover every aspect of the maintenance and inspection required.
response	

comment	*550* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

ML.A.302 Aircraft maintenance programme
(d) A 'Minimum Inspection Programme':
(1) shall contain the following inspection intervals:
Every annual or 100 h interval, whichever comes first. A tolerance of 1 month or 10 h may be applied to that interval. The next interval shall be calculated from the time the inspection takes place.

FOCA: If the tolerance can be accumulated, the ARC may meanwhile expire.

response

comment *559* comment by: *GIPAG France (French General Aviation Operators Professional Union)*

Each airplane has different specific features and variances. Due to this fact, the GIPAG France do not agree that a given aircraft MP can solely comply with a generic MIP. Any MP, even simplified has to comply with the one and only relevant MP which is the "Manufacturer MP". The MP should have as reference the only and unique reference of M.A.302 (d) and (e) as following:
"(d) The aircraft maintenance programme must establish compliance with:
(i) instructions issued by the competent authority;
(ii) instructions for continuing airworthiness:
• issued by the holders of the type certificate, restricted type-certificate, supplemental type-certificate, major repair design approval, ETSO authorisation or any other relevant approval issued under Regulation (EC) No 1702/2003 and its Annex (Part-21), and
• included in the certification specifications referred to in point 21A.90B or 21A.431B of the Annex (Part-21) to Regulation (EC) No 1702/2003, if applicable;
(iii) additional or alternative instructions proposed by the owner or the continuing airworthiness management organisation once approved in accordance with point M.A.302, except for intervals of safety related tasks referred in paragraph (e), which may be escalated, subject to sufficient reviews carried out in accordance with paragraph (g) and only when subject to direct approval in accordance with point M.A.302(b).
(e) The aircraft MP shall contain details, including frequency, of all maintenance to be carried out, including any specific tasks linked to the type and the specificity of operations."
Besides, as already written in the paragraph 2.3.4, this NPA's proposal represents a loss of business for CAMOs that have invested in IT and human resources to meet the requirements of the authority regarding aircraft airworthiness. And suddenly this NPA wants to change this. This change will undermine their efforts, especially for some companies, for whom being a CAMO is the only activity.

GIPAG France does not agree with the possibility that the owner can define its own maintenance program without following the manufacturer's MP and their recommendations. GIPAG France demands that the MP is approved either by a CAMO or by the authority, and that it is consistent conforms to the manufacturer's MP. GIPAG France may accept that the MP is not necessarily approved but it has to be, *a minima,* compliant to the manufacturer's MP.

response

comment | *577* comment by: *Irish Aviation Authority*

ML.A.302 (d) 2
“Operational test of transponder (if existing)”.

The use of the term 'if existing' is not consistent with other parts of the regulations. Suggest wording change to “Operational test of transponder (if installed)” for clarification.

response |

comment | *585* comment by: *Colin Wolstenholme*

ML.A 302 (a)

balloons are simple, they do not need A M P - the manufactures manual is enough. Reduce the regulation on balloons as per the Basic Regulations !

response |

comment | *615* comment by: *FNAM (French Aviation Industry Federation)*

Each airplane has different specific features and variances. Due to this fact, the FNAM do not agree that a given aircraft MP can solely comply with a generic MIP. Any MP, even simplified has to comply with the one and only relevant MP which is the “Manufacturer MP”. The MP should have as reference the only and unique reference of M.A.302 (d) and (e) as following:
“(d) The aircraft maintenance programme must establish compliance with:
(i) instructions issued by the competent authority;
(ii) instructions for continuing airworthiness:
• issued by the holders of the type certificate, restricted type-certificate, supplemental type-certificate, major repair design approval, ETSO authorisation or any other relevant approval issued under Regulation (EC) No 1702/2003 and its Annex (Part-21), and
• included in the certification specifications referred to in point 21A.90B or 21A.431B of the Annex (Part-21) to Regulation (EC) No 1702/2003, if applicable;
(iii) additional or alternative instructions proposed by the owner or the continuing airworthiness management organisation once approved in accordance with point M.A.302, except for intervals of safety related tasks referred in paragraph (e), which may be escalated, subject to sufficient reviews carried out in accordance with paragraph (g) and only when subject to direct approval in accordance with point M.A.302(b).
(e) The aircraft MP shall contain details, including frequency, of all maintenance to be carried out, including any specific tasks linked to the type and the specificity of operations.”
Besides, as already written in the paragraph 2.3.4, this NPA's proposal represents a loss of business for CAMOs that have invested in IT and human resources to meet the requirements of the authority regarding aircraft airworthiness. And suddenly this NPA wants to change this. This change will undermine their efforts, especially for some companies, for whom being a CAMO is the only activity.
FNAM does not agree with the possibility that the owner can define its own maintenance program without following the manufacturer’s MP and their recommendations. FNAM demands that the MP is approved either by a CAMO or by the authority, and that it is consistent conforms to the manufacturer‘s MP. FNAM may accept that the MP is not necessarily approved but it has to be, *a minima,* compliant to the manufacturer's MP.

response	

comment	*635* comment by: *René Meier, Europe Air Sports* ML.A.302(d)(7) Page 26 Remark: Concerns of our community: “If the review shows discrepancies on the aircraft linked to deficiencies in the content of the AMP, the AMP shall be amended accordingly. The person performing the review shall inform the competent authority of the Member State of Registry in those cases where he/she does not agree with the measures taken by the owner in order to amend the AMP.” question: What happens next: Will the NAA ground the aircraft? What are the sanctions? On which grounds? ML.A.302 (d) (2): Page 27 Page Servicing tasks Question: What is meant by “servicing tasks”? All maintenance tasks recommended by the DAH? Or only required by DAH? If so, no TBO extensions can be allowed. This has to be clarified. Or only required by DAH?
response	

comment	*661* comment by: *René Meier, Europe Air Sports* (5) in addition…Maintenance recommendations Page 26 Remark: We repeat our urgent request to never make “hard law” of recommendations in any member state. Rationale: This never was the intention.
response	

comment	*662* comment by: *René Meier, Europe Air Sports* (5) Pilot-owner maintenance… Page 26 Remark „Pilot-owner“ without the „Limited" is great, that is want we wish to see troughout the document, many thanks! Rationale:

	Pilot-owners are not limited, they are in full responsible for the aircraft. All licences are somehow limited, in our view, none we know reflects this fact in its title.
response	

comment	*663* comment by: *René Meier, Europe Air Sports* (7) shall be reviewed... Page 26 Remark: For aircraft older than ten years every three years is appropriate, we think, earlier only after important maintenance actions or in the case of justified doubts. For newer aircraft "at least annually" is good for us. Rationale: We think our proposal covers the needs, is proportionate and risk-based.
response	

comment	*664* comment by: *René Meier, Europe Air Sports* (2) shall contain the following: Page 27 Review of weighing records and weighing... Remark: Will still are of the opinion that 965/2012 is not the right regulation to deal with weighing aircraft. Rationale: Regulation (EU) No. 965/2012 deals with Air Operations. Is weighing a maintenance task or is it not? Please clarify.
response	

comment	*665* comment by: *René Meier, Europe Air Sports* Operational test of transponders Page 27 Remark: Please go for a two years interval, this is sufficient. Rationale: In doing so you would apply FAA's solution according to 14 CFR 91.413 which asks for such tests only every 24 months, regardless of VFR and/or IFR operations are undertaken. No difference is to be made between these two operational conditions.
response	

comment	*689* comment by: *Balóny Kubíček* Refer to my previous comment

	Balloons are so simple aircraft that there is no need for MP. KUBICEK BALLOONS strongly recommends to remove any requirement for MP. MP has no impact on safety. FAA does not require any similar paper and balloons in US are flying safely. Let's take an example from FAA. Same Canada, Australia. Why we need this in Europe? The only effect is increased cost of running of AMO which needs to be passed to the clients.
response	

comment	*712* comment by: *Quality Manager Easy Balloons Ltd* ML.A.302 Aircraft maintenance programme (a) The maintenance of each aircraft shall be organised in accordance with an AMP. In the case of hot air balloons you could probably get away with one generic AMP. We never have had individual ones. This would increase bureaucracy. Pointless. Disagree.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.304 Data for modifications and repairs p. 28

comment	*177* comment by: *Claude Lelaie* **ML.A.304**: More freedom should be given to approved maintenance organizations for small repairs.
response	

comment	*239* comment by: *CAA-NL* **ML.A. 304 Data for modifications and repairs** We suggest to refer to CS-STAN instead of the relevant points of Part 21, this gives direct access to the related document without searching your way through Part 21.
response	

comment	*666* comment by: *René Meier, Europe Air Sports* Page 28 (c) AC 43-13 1B of FAA is ok for us. Question: What about the European approach to standard changes and standard repairs as proposed by "CS-STAN" Phases I and II: Should this not be inserted here?
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI p. 28-29

(Part-ML) to Regulation (EU) No 1321/2014 — ML.A.305 Aircraft continuing airworthiness record system

comment *81* comment by: *BPvL/AEI*

(b)1 those log-books were not used in Germany since 1968 and for service-life limited parts there are no logs, only Form 1 for alternators,magnetos, hoses etc.
They were all stored in 1 folder.
It´s a way too big issue to convert it to the new system

response

comment *240* comment by: *CAA-NL*

ML.A.305 Aircraft continuing airworthiness record system
We suggest to replace the current text of the rule with the following performance based proposal. The current text could be combined with the current AMC and GM to go with the new rule.
'The owner of an aircraft shall maintain an aircraft continuing airworthiness record system as the mean to assess the airworthiness status of an aircraft and its components. An aircraft continuing airworthiness record system includes the processes to keep and manage those records and should be proportionate to the subject aircraft.
Aircraft continuing airworthiness records should provide the owner/operator of an aircraft with the information needed:
· **to demonstrate that the aircraft is in compliance with the applicable airworthiness requirements, and**
· **to schedule all future maintenance as required by the aircraft maintenance program based on the last accomplishment of the specific maintenance as recorded in the aircraft continuing airworthiness records.'**
If the proposal above is not accepted, then at least this point needs to be aligned with the work performed with the task RMT.0276.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.307 Transfer of aircraft continuingairworthiness records p. 29-30

comment *269* comment by: *UK CAA*

Page No: 29

Paragraph No: ML.A.307 Transfer of aircraft continuing airworthiness records

Comment: Reference is made to ML.A.306, however there is no such paragraph in this NPA. Either the reference to ML.A.306 needs to be removed or a paragraph needs to be added.

Justification: Correctness and completeness.

response

comment	*292* comment by: *Luftfahrt-Bundesamt* *ML.A.307(a)* The term owner here is unclear (perious owner or new owner??).
response	

comment	*501* comment by: *Belgian CAA* 1. ML.A.307 : this article refers to ML.A.306 that does not exist.
response	

comment	*555* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland* ML.A.306 could not be found in the NPA 2015-08.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.401 Maintenance data p. 30

comment	*270* comment by: *UK CAA* **Page No:** 30 **Paragraph No:** ML.A.401(b)3 **Comment:** Revise paragraph to make reference to 'Design Approval Holder' and delete reference to 'TC holder, STC holder' etc. (UK CAA comment on paragraph ML.1 General refers). **Justification:** Consistency of language. **Proposed Text:** Amend to read: '(3) applicable instructions for continuing airworthiness issued by **the design approval holder**.'
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.402 Performance of maintenance p. 30

comment	*82* comment by: *BPvL/AEI* (c) My garage fullfills that requirement too, but is not controlled by the NAA.

	The maintenance data tells us nothing or very few about limitations. Main thing: No audit by the NAA will take place to ensure safety standards
response	

comment	*179* comment by: *Claude Lelaie* **ML.A 402**: No effort to simplify compared to Part-M because (g) has been added! Useless as it is the standard way to work.
response	

comment	*241* comment by: *CAA-NL* **ML.A.402(a) performance of maintenance** Please align the part of the text related to the independent inspection to the new performance based text for M.A.402(h), voted positively in the EASA committee of 8-7-2014: **(h) ensure that an error capturing method is implemented after the performance of any critical maintenance task**.
response	

comment	*271* comment by: *UK CAA* **Page No:** 30 **Paragraph No:** ML.A.402(a) Performance of maintenance **Comment:** Reference is made to Independent Inspections, however unlike Part M, M.A.402, there is no supporting AMC to this paragraph. **Justification:** Completeness **Proposed Text:** AMC ML.A.402 to be added, as follows: "Independent inspections · The manufacturer's instructions for continued airworthiness should be followed when determining the need for an independent inspection. • In the absence of maintenance and inspection standards published by the organisation responsible for the type design, maintenance tasks that involve the assembly or any disturbance of a control system that, if errors occurred, could result in a failure, malfunction, or defect endangering the safe operation of the aircraft should be considered as flight safety sensitive maintenance tasks needing an independent inspection. A control system is an aircraft system by which the flight path, attitude, or propulsive force of the aircraft is changed, including the flight, engine and propeller controls, the related system controls and the associated operating mechanisms. · Independent inspections should be carried out by at least two persons, to ensure

correct assembly, locking and sense of operation. A technical record of the inspections should contain the signatures of both persons before the relevant CRS is issued.

· An independent inspection is an inspection first made by an authorised person signing the maintenance release who assumes full responsibility for the satisfactory completion of the work, before being subsequently inspected by a second independent competent person who attests to the satisfactory completion of the work recorded and that no deficiencies have been found.

· The second independent competent person is not issuing a maintenance release therefore is not required to hold certification privileges. However they should be suitably qualified to carry out the inspection.

· When work is being done under the control of an approved maintenance organisation the organisation should have procedures to demonstrate that the signatories have been trained and have gained experience on the specific control systems being inspected.

· When work is being undertaken by an independent M.A.801 (b) 2 certifying staff, the qualifications and experience of the second independent competent person should be directly assessed by the person certifying for the maintenance, taking into account the individual's training and experience. It should not be acceptable for the certifying staff signing the release to show the person performing the independent inspection how to perform the inspection at the time the work is completed.

· In summary the following maintenance tasks should primarily be considered when inspecting aircraft control systems that have been disturbed:

installation, rigging and adjustment of flight controls.

installation of aircraft engines, propellers and rotors.

overhaul, calibration or rigging of components such as engines, propellers, transmissions and gearboxes.

Consideration should also be given to:

previous experience of maintenance errors, depending on the consequences of the failure.

information arising from an 'occurrence reporting system'

- When checking control systems that have undergone maintenance the person signing the maintenance release and the person performing the independent check should consider the following points independently:

all those parts of the system that have actually been disconnected or disturbed should be inspected for correct assembly and locking.

the system as a whole should be inspected for full and free movement over the complete range.

cables should be tensioned correctly with adequate clearance at secondary stops.

the operation of the control system as a whole should be observed to ensure that the controls are operating in the correct sense.

if the control system is duplicated to provide redundancy, each system should be checked separately.

if different control systems are interconnected so that they affect each other, all the interactions should be checked through the full range of the applicable controls."

response

comment *361* comment by: *CAA Finland*

Independent inspection is difficult to arrange in case of independent certifying staff. There should be at least ACM or GM material how this could be arranged with one person. Other possibility is to remove this requirement from Light Part-M

response

comment *428* comment by: *FAA*

Section:
ML.A.402 Performance of maintenance

(e) In case of inclement weather or lengthy maintenance, proper facilities shall be used.

Comment:
What is the criteria for determining the "proper facility"?
As part of the implementation of this rule, EASA may wish to develop guidance on how to determine a proper facility.

response

comment *649* comment by: *DGAC France*

ML.A.402 (a): DGAC France proposes to withdraw the end of the paragraph " Furthermore, an independent inspection shall be carried out after any flight-safety-sensitive maintenance task unless otherwise specified by Part-145 or agreed by the competent authority", as it is not relevant in this specific case.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.403 Aircraft defects p. 31

comment *157* comment by: *Ian HEY*

ML.A.403 (d)
In many private and club operations it is very difficult to make deferred defects visible to the pilot. This will require more paperwork and hence cost, contrary to the intent of the regulation.
In many cases this requirement will prevent any deferred defects.

response

comment *167* comment by: *DE LOOF JEAN PIERRE*

Re-use of parts to rectify defect
Allow the staff in charge of maintenance to dessemble parts from an aircraft out of order, check its airworhiness, eventually do an overhaul of the part, and install the part on an other aircraft of the same type. a conformity certificate or a light Form 1 could be delivered by this certifying staff.

response

comment *272* comment by: *UK CAA*

Page No: 31

Paragraph No: ML.A.403 (b)(2) Aircraft defects

Comment: The wording of this paragraph infers that the pilot can defer a defect on **required equipment** when using the MEL approved by the competent authority, 'otherwise, these defects may only be deferred by the authorised engineer'. It is not clear what the circumstances are when an authorised engineer may defer a defect affecting **required equipment**

Justification: Potential Flight Safety Hazard, Human factors

Proposed Text: Replace sub-paragraph (b)(2) with the following:

"(2) Defects affecting required aircraft equipment may be deferred by the pilot or authorised engineer using the minimum equipment list either approved by the competent authority, EASA, or by using the MMEL approved by the State of Design. Otherwise these defects may not be deferred."

response

comment *273* comment by: *UK CAA*

Page No: 31

Paragraph No: ML.A.403 (d)

Comment: This point implies that any defect not rectified before flight shall be recorded in the ML.A.305 aircraft maintenance record system and shall be visible to the pilot. The

aircraft maintenance records for aircraft affected by Part ML are not required to carry any documents (e.g. a technical log) that provide a means of communication between pilots or between pilots and maintenance personnel (maintenance/airworthiness). It is highly unlikely that the ML.A.305 records will be available on a flight line.

Aircraft regardless of weight and type of operation should carry a minimum technical document that allows for provision to record defects. AMC to ML.A.403 (d) should be developed to describe typical documentation or electronic media that can be used to record deferred defects and notify pilots/maintenance personnel.

Justification: Potential Flight Safety Hazard

Proposed Text: Amend ML.A.403 (d) as follows:

"Any defect not rectified before flight shall be recorded in the ML.A.305 aircraft maintenance record system and shall be visible to the pilot, **owner and authorised certifying staff**."

In addition, AMC to ML.A.403 (d) should be developed to provide examples of how this is made available to all relevant personnel.

response

comment *411* comment by: *Swedish Transport Agency*

STA propose a definition of the "non-required aircraft equipment" or give some examples in GM as guidance.

response

comment *439* comment by: *Dutch gliding association*

MLA.501 (d)
Materials en consumable materials used for gilder maintenance documentation containing a conformity to specification statement plus both the manufacturing and supplier source is not always avialable. So the proposed is not always feasible and is impratical.

response

comment *500* comment by: *Belgian CAA*

1. M.A.403: For the dispatch of an aircraft defect it could be more appropriate to keep the notion already existing in the current regulation: "can decide, using M.A.401 maintenance data" and also the MEL or CDL when applicable.
Otherwise, the possibility given to pilot to defer items in accordance with ML.A.403 (b) (3) may be seen as contradictory to ML.A.403 (c) requesting that the rectification of deferred defects be done within limits specified in maintenance data.

response

comment *502* comment by: *Belgian CAA*

	1. M.A.403 (1): AMC should describe what is understood by "non-required" equipment.
response	

comment	*503* comment by: *Belgian CAA* 1. ML.A.403 (§d) : it could be important to also refer to the M.A.306 when applicable.
response	

comment	*560* comment by: *GIPAG France (French General Aviation Operators Professional Union)* The GIPAG France thinks that the notion « available » in ML.A.403 (3) is to light. EASA must find another term or explain it before any safety issues happened.
response	

comment	*579* comment by: *Irish Aviation Authority* ML.A.403 (b) (1) Suggest “non-required aircraft equipment” be worded as “aircraft equipment not required for the intended flight” for clarity.
response	

comment	*616* comment by: *FNAM (French Aviation Industry Federation)* The FNAM thinks that the notion « available » in ML.A.403 (3) is to light. EASA must find another term or explain it before any safety issues happened.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.501 Installation p. 31-32

comment	*16* comment by: *Ulrich NIGGLI* It is a fact that in sailplanes and powered sailplanes, many parts are installed that are not released with a form 1 (Navigation computers, bugwipers, variometers(…)). Do these count as standard parts?
response	

comment	*53* comment by: *BBAC British Balloon and Airship Club (UK)* (e) In the particular case of balloons, where different combinations of baskets, burners and fuel cylinders are possible for a particular envelope, the person installing them shall ensure that:

(1) the basket, burner and/or fuel cylinders are eligible for installation according to the TCDS; and
(2) the basket, burner and/or fuel cylinders are in serviceable condition and have the appropriate maintenance records.

BBAC: Supported as written

response

comment *102* comment by: *Phil Dunnington*

Entirely support this procedure as expressed in Paras 1 @ 2.

response

comment *315* comment by: *Jos TREHERN*

Re: (e) In the particular case of balloons, where different combinations of baskets, burners and fuel
cylinders are possible for a particular envelope, the person installing them shall ensure that:
(1) the basket, burner and/or fuel cylinders are eligible for installation according to the TCDS;
and
(2) the basket, burner and/or fuel cylinders are in serviceable condition and have the appropriate maintenance records.

This is supported.

response

comment *371* comment by: *CAA Finland*

ML.A501 "EASA Form1 or equivalent" what is equivalent? AMC ML.A.501 missing. Is component log card equivalent? Replacing a component from the aircraft to another should be possible by independent certifying staff.

response

comment *524* comment by: *European Balloon Federation*

ML.A.501(e)
EBF welcomes this clarification, which confirms the acceptability of what has always been standard practice within ballooning.

response

comment *540* comment by: *Cameron Balloons Ltd*

Providing the component inspectons are carried out in accordance with the TCDS holders

	maintenance schedules then this should be allowed.
response	

comment	*586* comment by: *Colin Wolstenholme* I support paragraph e
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.502 Component maintenance p. 32

comment	*185* comment by: *Luftsport Verband Bayern / Germany* We appreciate very much the new presentation of this paragraph because the text in M.A.502 is nearly not understandable. Can EASA please transfer this "design" also to M.A.502.
response	

comment	*218* comment by: *Allie Dunnington* page 32: I am supporting paragraph e) in that the person who is inspecting different combinations of baskets, burners and fuel cylinders should ensure that: 1. all of the above are eligible for installation according to the TCDSs and 2. all of them are in serviceable condition and have the appropriate maintenance records.
response	

comment	*341* comment by: *WESERTRAINER FLIGHT TRAINING* **<u>Release of overhaul of engines and propellers for CS-23 ELA 1 at aircraft level per ML.A 801</u>** The Release of overhaul of engines and propellers for CS-23 ELA at aircraft level per ML.A 801 should be possible. By comparison of technical complexity of engines and propellers and risk assement of CS-VLA, CS-22, LSA on the one side and CS-23 aircraft up to 1200 kg (ELA1) on the other side there is no good reason to exculde CS-23 Aircraft aircraft up to 1200 kg from the right of release the overhaul of engines and propellers at aircraft level per ML.A 801. After positive risk assessment this may also be adopted to ELA 2 aircraft.

response

comment *366* comment by: *CAA Finland*

ML.A.502 (b) In case of CS-VLA, CS-22 and LSA, even for ELA1 (M.A.502(b),(d) which is by the way very difficult to understand), overhaul of components should be possible for independent certifying staff. It is also unclear what parts are components in case of engine overhaul.

response

comment *561* comment by: *GIPAG France (French General Aviation Operators Professional Union)*

Independent mechanics do not have to be as compliant with the regulation as approved frameworks have to be, regarding all what is necessary for maintenance tools. It is also the case with NAAs, independent mechanics do not have to pay fees and royalties and are not subject to repetitive audits as often as Part-M-F/G are.
The GIPAG France wishes to see a strengthening of the monitoring on Independent mechanics and wishes to make them pay the fee before the EASA leaves them the same rights as the approved frameworks.
Indeed if that regulation applies as it is, the GIPAG fears that the number of Part-M decrease in a significantly way. An impact on flight safety is expected.

response

comment *617* comment by: *FNAM (French Aviation Industry Federation)*

Independent mechanics do not have to be as compliant with the regulation as approved frameworks have to be, regarding all what is necessary for maintenance tools. It is also the case with NAAs, independent mechanics do not have to pay fees and royalties and are not subject to repetitive audits as often as Part-M-F/G are.
The FNAM wishes to see a strengthening of the monitoring on Independent mechanics and wishes to make them pay the fee before the EASA leaves them the same rights as the approved frameworks.
Indeed if that regulation applies as it is, the FNAM fears that the number of Part-M decrease in a significantly way. An impact on flight safety is expected.

response

comment *632* comment by: *EFLEVA*

EFLEVA believes that it should be possible for components, engines and propellors to be released by independent certifying staff.

See Page 32
ML.A.502 Component maintenance
(b) [*Right hand column of table: "Released at aircraft level per ML.A.801 [Aircraft certificate*

of release to service] (not possible to issue a[n EASA] Form 1)" **]**
[Row 2]: Overhaul of components other than engines and propellers: Not Possible
[Row 4]: Overhaul of engines and propellers for other than CS-VLA, CS-22 and LSA: Not Possible

response

comment *713* comment by: *Quality Manager Easy Balloons Ltd*

(e) In the particular case of balloons, where different combinations of baskets, burners and fuel cylinders are possible for a particular envelope, the person installing them shall ensure that:
(1) the basket, burner and/or fuel cylinders are eligible for installation according to the TCDS; and
(2) the basket, burner and/or fuel cylinders are in serviceable condition and have the appropriate maintenance records.

Broadly agree.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.503 Service life-limited components p. 33

comment *7* comment by: *John b. Williamson*

ML.A.502

Please confirm "Overhaul of Engines & Propellers for CS-VLA, CS-22 & LSA" may be carried out by 'Independent Certifying Staff'
This facility was previously allowed by UK Part M BGA authorised Inspectors; but was witdrawn by UK CAA some two years ago
END

response

comment *8* comment by: *John b. Williamson*

MLA.503 'Service Life Limited Components'
Suggest add text, from previous, Part M (ED 2013/025/R) incorporated in Part M AMC2 MA. 302(d)
Aircraft Maintenance Programme; this text was withdrawn shortly after publication 19 DEC 2013 !
This dealt with T.B.O and also 'Trend Monitoring
With the more liberal legislation for Part ML; for ELA 1 & ELA 2 aircraft, a more relaxed approach to TBO's should also be considered, as per the previous EASA amendment in 2013
UK CAA (CAP 747 GR #24) already allows Piston Engine 'Life' on condition if Private Category; or 20% extension initally if commercial operator.
END

response

comment *186* comment by: *Luftsport Verband Bayern / Germany*

(c) must read "At the end **of** the approved service life...."

response

comment *242* comment by: *CAA-NL*

ML.A.503 Service life limited components
Please align the text with the work performed with the task RMT.0276.

response

comment *274* comment by: *UK CAA*

Page No: 33

Paragraph No: ML.A.503 Service life-limited components

Comment: There is no definition of 'Service Life Limit' or 'Certified Life Limit'. It is suggested that AMC is added to clarify.

Justification: Clarity.

Proposed Text:

(i) Certified Life Limit refers to components subject to a life, expressed in flying hours, flight cycles or calendar time, after which the components shall be retired.

(ii) Service Life Limit refers to components subject to a life, expressed in flying hours, flight cycles or calendar time, after which the components shall undergo maintenance to restore their serviceability.

response

comment *667* comment by: *René Meier, Europe Air Sports*

ML.A.503
Page 33
Remark:
Flexibility should apply.

Rationale:
This proposal, copied from Part-M, is too strict for sports and recreational activities, especially when we have to deal e.g. with oxygen bottles and/or safety belts or harnesses.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.504 Control of unserviceable components p. 33

comment *187* comment by: *Luftsport Verband Bayern / Germany*

(d) Here is an instruction for personnel working under "Part-M or Part-ML". EASA has properly separated Part-M from Part-ML so it should be avoided to regualte something for Part-M in Part-ML.

response

comment *243* comment by: *CAA-NL*

ML.A.504 Control of unserviceable components
Please align the text with the work performed with the task RMT.0276.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.801 Aircraft certificate of release to service p. 34-35

comment *23* comment by: *CAMO Support Ireland*

Sub Part H CRS ML.A.801 (c)

The owner may authorise any person with not less than 3 years appropriate maintenance experience and holding proper qualifications to maintain according to the standards set out in Sub part D of this part and release the aircraft.

I think some text needs be added here to give the CAMO this privilege rather than leaving it in the hands of the owner in the case where an aircraft is contracted to a CAMO.
Upon the signing of a CAMO contract the owner hands over the airworthiness oversight of the aircraft to the CAMO therefore such privileges should remain with in the remit of the CAMO for those contracted aircraft. What the owner deems as an "appropriate person" may differ from the CAMO's position.
I don't think it is acceptable for a CAMO to be informed of such an intervention by an owner up to 7 days later.

response

comment *158* comment by: *Ian HEY*

ML.A.801 (e) (3) (i)
The requirement for the approval reference of the maintenance organisation to be on the CRS, in addition to the approval reference of the certifying staff is yet another case of unnecessary beauracracy. The maintenance organisation reference is not relevant to the CRS. Identification of the certifying staff will be sufficient.

response

comment	*244* comment by: *CAA-NL* **ML.A.801 Aircraft CRS** · (c): Some GM might be helpful to determine what is a proper qualification is for someone outside the EASA system, both for owners and CA's. · (d): If it is the intention that the certifying staff is always present and controlling what to assisting persons are executing, then maybe the words '**direct and continuous supervision**' are clearer.
response	

comment	*253* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016* Only paper. No impact for aircraft safety.
response	

comment	*275* comment by: *UK CAA* **Page No:** 34 **Paragraph No:** ML.A.801 Aircraft certificate of release to service **Comment:** There is no AMC to support what is meant by 'proper qualifications'. It is recommended that AMC is added as proposed below. **Justification:** Clarification. **Proposed Text:** Add new AMC: "Holding the proper qualifications" means holding either: a) a valid ICAO Annex 1 compliant maintenance license for the aircraft type requiring certification, or; b) a certifying staff authorisation valid for the work requiring certification, issued by an ICAO Annex 6 approved maintenance organisation.
response	

comment	*363* comment by: *CAA Finland* ML.A.801(e) the maintenance data used is missing from the list.
response	

comment	*459* comment by: *Hermann Spring* **MLA.801 g**

	Do **not list the no-goes,** remain on the positive side with how-to-do statements. Modify this item to a positive statement and move it to the basic statements
response	

comment	*582* comment by: *Irish Aviation Authority* ML.A.801 (c) This paragraph allows a pilot to authorise a person, who is not certifying staff, to release the aircraft. It requires that person to hold "the proper qualifications." Can the term "proper qualifications" be clarified further please?
response	

comment	*602* comment by: *ULTRAMAGIC, S.A. (JVT)* **Form 1 / CRS applicability:** ULTRAMAGIC urges the Agency to clarify the applicability of Form 1 and CRS when considering the particularities of the Hot Air Balloons. Due to the ease of changeability of the balloon components, and the fact that these are generally disassembled for transportation between flights, inspections may not necessarily take place with all the components present (components may have different scheduled inspection dates). A possible criteria -which has been adopted for years by several organisations- is as follows: CRS to be issued whenever an Envelope is released to service. It may include also other components (i.e. basket, etc). Form 1 to be issued for stand-alone components other than the Envelope *(would it be also acceptable to release an envelope only with a Form 1?)*
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.802 Component certificate of release to service p. 35

comment	*714* comment by: *Quality Manager Easy Balloons Ltd* (b) For aircraft operated under Part-NCO rules, the Pilot-owner may issue a CRS after limited Pilot- owner maintenance as specified in Appendix I. Agreed but Pilot/Owner maintenance should only be carried out according to the approved relevant Manufacturers' Manual.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.803 Pilot-owner authorisation p. 35

comment	*54* comment by: *BBAC British Balloon and Airship Club (UK)* (b) For aircraft operated under Part-NCO rules, the Pilot-owner may issue a CRS after limited Pilot-owner maintenance as specified in Appendix I. BBAC: Supported as written, but we prefer that the POM tasks are defined in the manufacturer's manual and that there is no AMP
response	

comment	*103* comment by: *Phil Dunnington* Pilot Owner maintenance should be permitted on all balloons in accordance with the Manufacturer's Maintenance Manual.
response	

comment	*180* comment by: *Claude Lelaie* **ML.A.803 (a) (2) (ii)**: "Non profit recreational" is another useless restriction. We should not forget that we are dealing with ELA2. As an example, the situation could well be a pilot having 100% of the shares of the company owner of the aircraft, not allowed to decide. In comparison, a member of an aero-club, with few experience, could be allowed to make such a decision. All that is not logic. Best way is to remove this restriction.
response	

comment	*188* comment by: *Luftsport Verband Bayern / Germany* (a) (2) (i) Please be aware that not all owners may be listed in the registration form. Alternatively a confirmation of the registration body may be used to prove that the person is one of the owners.
response	

comment	*219* comment by: *Allie Dunnington* page 35, middle section: paragraph b) allowing Pilot owner maintenance (POM)and issuing CRS forms after limited POM is a positive motion but all the POM tasks should be recorded in the manufacturer's manual and the pilot should check that there is no relevant AMP.
response	

comment	*316* comment by: *Jos TREHERN* **Re: ML.A.803 Pilot-owner authorisation** OBJ **(b) For aircraft operated under Part-NCO rules, the Pilot-owner may issue a CRS after limited Pilot-owner maintenance as specified in Appendix I.**

This is supported subject to the Pilot-Owner maintenance tasks being documented in the manufacturer's manual and that there is no AMP.

response

comment *333* comment by: *WESERTRAINER FLIGHT TRAINING*

Limitation on members of non-profit recreational legal entities is nonsencial

The limitation on members **non-profit recreational** legal entities is nonsencial and should be removed ! Many small aircraft are owned by small legal entities running a business which has nothing to do with aviation using their aircraft in a mix for buisness trips and recreational flying activities during holiday.

By national entity / tax law often these aircraft have to be owned by the entity when used for business trips. Otherwise national tax-law would be broken. There is absolutly no good reason to exclude those owners / entities from Pilot-owner maintenance.

response

comment *386* comment by: *BGA*

Segment description 3. Proposed amendments New Annex VI, (PML)
MLA.803 Pilot/owner maintenance. Page 35

For aircraft operated under NCO the Pilot/owner may issue a CRS after limited PO maintenance as specified in Appendix 1

Supported. The Pilot/owner is ultimately responsible for airworthiness (MLA201) and has done the job as authorised. What further barrier is there?

response

comment *407* comment by: *Ministry of National Development*

What can be equivalent with a pilot licence?
Is there any other licence or document what can be replace the pilot licence?

response

comment *542* comment by: *Cameron Balloons Ltd*

Pilots Owner Maintenance should be limited and it should only need an entry in the log book.

response

comment *588* comment by: *Colin Wolstenholme*

re b

I support section b, - but teh tasks should be in teh manufacturers manula and no AMP is necessary

response

comment *668* comment by: *René Meier, Europe Air Sports*

ML.A.803
Pilot-owner maintenance
Page 35
Remark
See: there is no “Limited” any more! Thank you!

Rationale:
This "limited" really is not needed, of no added value.

response

comment *669* comment by: *René Meier, Europe Air Sports*

(1)
Page 35
Remark:
Please change to “
(1) “hold or have held in the past five years a valid pilot licence…”

Rationale:
Competence in maintenance and a pilot’s competence are not so strictly linked. Particularly in a club environment the acceptance of our proposal will be helpful.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.901 Aircraft airworthiness review p. 35-36

comment *17* comment by: *Ulrich NIGGLI*

In gliding, the maintenance is done within clubs by trained staff (at the moment holding national licences, in the future Part-66 licences). However the gliding clubs are normally not approved maintenance organisations. At the moment this is no problem and the ARC can be extended twice by the CAMO. This must remain possible in future, otherwise this would generate new costs and would be time-consuming (physical review normally only possible during the week, but the club personell is working…) without any safety benefit.

response

comment *55* comment by: *BBAC British Balloon and Airship Club (UK)*

(b) The airworthiness review and the issuance of the ARC shall be performed in accordance

with point M.A.710 of Part-M by:
(1) the competent authority; or
(2) a CAMO; or
(3) the approved maintenance organisation performing the annual inspection contained in the AMP, while in compliance with the requirements contained in point M.A.901(l) of Part-M; or
(4) for sailplanes, balloons, hot-air airships and ELA1 aeroplanes, operated under Part-NCO rules, the certifying staff performing the annual inspection contained in the AMP, when:
(i) holding a Part-66 licence rated for the corresponding aircraft; and
(ii) having acquired knowledge, either by self-study, training or experience, of the parts of Part-ML relevant to continuing airworthiness management, performance of airworthiness reviews and issue of ARCs, including the applicable cross-referred parts of Part-M.

For aircraft where there is no Part-66 licence applicable, the certifying staff qualification of the State of Registry is an acceptable alternative, except that this is only valid for airworthiness reviews of aircraft registered in that Member State and the ARC will not benefit from mutual recognition when transferring the aircraft to another Member State.

BBAC: In the case that ARCs continue, the wording above (b) 1-4 is supported as written.

response

comment *104* comment by: *Phil Dunnington*

The contents of Para 4 are acceptable given that the abolition of the ARC and excluding balloons from Part CAT (and ultimately into Part NCO/Part BALLOONS).

response

comment *147* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden*

Airworthiness review by certifying staff: This is now restricted to ELA1. This should be raised to ELA2. Most aircraft up to 2000 kg has the same complexity and should be treated as such. Certifying staff are competent and should get more authority when it comes to this as well. As mentioned previously in this NPA, the aircraft that are excluded are a minority of the GA fleet and we should let them enjoy the same alleviations. If we strive to have the same set of rules for as many aircraft as possible we make it a lot easier for the community to know the rules. Many operators, especially in flight training, operate both ELA1 and ELA2 and this would be a distinct leap forward if we could change this.

response

comment *151* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden*

Independent certifying staff to perform AR and issue the ARC: IAOPA and all its subdivisions strongly encourages this restriction to be changed up to ELA2. The unlikely increase in complexity in weight difference is not enough to hold this back. As discussed previously when talking about the small amount of additional aircraft that is only ELA2 and not ELA1,

	the positive effects of this change would be substantial whilst a decrease in flight safety is not to be expected.
response	

comment	*181* comment by: *Claude Lelaie* **ML.901**: - (a): Why a validity of 1 year for the ARC for an aircraft monitored by a CAMO. It is just useless paperwork. By definition, when followed by a CAMO, the aircraft is always airworthy except if indicated otherwise in his documentation. Suggest to remove this restriction for aircraft followed by approved entities. - (b)(4): Why limited to ELA1. One more useless restriction. - (c): Extension 2 times. Same comment as (a).
response	

comment	*189* comment by: *Luftsport Verband Bayern / Germany* (c) (2) This paragraph seems to be misunderstandable. Proposal: "The aircraft has been maintained for the previous 12 months by approved maintenance organisations or maintenance tasks refered to in point ML.A.803(b) have been carried out and release to service in accordance with point ML.A.801(b)2 or point ML.A.801(b)3; and"
response	

comment	*220* comment by: *Allie Dunnington* I do support this whole paragraph starting at sector b) about the issuance of ARCs according with point M.A.710 of Part-M and following paragraphs 1), 2) , 3), 4) and (i) and (ii). Especially as hoping to newly qualify as an inspector it would deny me the full rights to finish complete inspections if I wasn't allowed to issue the ARC as well. I hope that I have wholly expressed my views and comments on why I believe that balloons do not need ARCs and would hope that EASA does follow their promises of looking into de-regulation and making general aviation - and here especially ballooning, airships, gasballoons - once more a safe and widly appreciated and enjoyed sport and/or profession. It would be very sad indeed to see this wonderful means of flying (man's oldest form of flight!) soon disappear just because nobody can afford the time nor money involved anymore or understands the complicated (and totally unnecessary) rules imposed on ballooning during the past few years. Thank you for reading through my comments and appologies if some of my comments ended up behind the wrong paragraphs. I appreciate the committee's efforts and hope that there will be a mutually satisfactory solution for all of us. Allie Dunnington, Bristol (but writing this from Burma where I am currently working as a commercial pilot and internet has been disastrous)
response	

comment *245* comment by: *CAA-NL*

ML.A.901 Airworthiness Review

· (b)(4) We do agree with the introduction of the possibility for these categories of aircraft to have the Airworthiness review performed in combination with the annual inspection and the ARC issued by individual Part 66 certifying staff. However we want these staff also to be accepted by the competent authority. This acceptance can be based on the performance of an airworthiness review under supervision from the CA itself or a recommendation by AR-staff of a CAMO after a supervised review within the CAMO. We suggest the following text to be inserted:
'(4)(iii) having satisfactory completed an airworthiness review under the supervision of the competent authority or under the supervision of the airworthiness review staff of an approved organisation who will recommend acceptance to the competent authority.'

· (c)(2) We do not agree with the fact that the maintenance and certification privileges of individual Part 66 certifying staff, contracted by the controlling CAMO, are still not accepted in relation with the extension of the ARC. The individual Part 66 certifying staff is getting privileges to issue an ARC when the airworthiness review is performed by hi/her together with the annual inspection, without any control of a CAMO, bud when a controlling CAMO is contracting that same Part 66 certifying staff to perform a 100 hours inspection than this work does not qualify for a simple extension of the ARC.
We suggest to accept the work performed according to the privileges granted in the EU system.
We suggest the following text for (c)(2):
'(c)(2) The aircraft has been maintained for the previous 12 months according Regulation EU 216/2008 and it s implementing rules.'
Further we suggest some GM related to ML.A.402 to explain which maintenance can/must be performed by whom. This could be in the form of a table similar as that in ML.A.502 on component maintenance.

response

comment *254* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016*

Stamp and/or signature of a certifiing staff will be enough.

response

comment *277* comment by: *UK CAA*

Page No: 36

Paragraph No: ML.A.901 (b)(3) Aircraft airworthiness review

Comment: There is no mention of the ARC review 90 day anticipation period within NPA 2015-08, it is obliquely referenced in ML.A.901(b)(3) by way of a reference to M.A.901(l) of Part M.

It is also proposed that the Annual Inspection has a 30 day anticipation period to match that of the ARC. A 90 day anticipation period for the annual inspection is considered

inappropriate.

Justification: To create a separate 'Light Part-M' (Part ML), independent from Part-M, which is clear and simple as possible.

Proposed Text: Add new sub-paragraph ML.A.901 (e) as follows:

"By derogation to point ML.A.901 (a) and ML.A.901(b)(3), the airworthiness review can be anticipated by a maximum period of 30 days without loss of continuity of the airworthiness review pattern and to retain alignment with the annual inspection."

response

comment *278* comment by: *UK CAA*

Page No: 36

Paragraph No: ML.A.901 (b)(4) i and ii Aircraft airworthiness review

Comment: The proposed change to allow Part 66 certifying staff to carry out annual inspection, airworthiness review and review of the AMP, in accordance with M.A.710 of Part M, does not require copies of the airworthiness review certificate issued together with any supporting documents to be kept, this was previously addressed in Part M, M.A.714 (b) and (d), for organisations holding privileges in point M.A.711 (b). The record system to be established by the owner ML.A.305 (h) does not make provision for these records.

Justification: If there is no requirement for Part 66 certifying staff to pass the records of an airworthiness review previously applied under Part M, M.A.714 (b) and (d) to the aircraft owner, the Part 66 certifying staff may not in practice keep or pass on the certificate or supporting documents., The document trail supporting the airworthiness of the aircraft could therefore be lost and the airworthiness of the aircraft is cast into doubt.

Proposed Text: It is recommended that an additional sub paragraph should be added at ML.A.305 (h) – item 7:

"(7) In the case where an independent Part 66 rated licence holder performs the airworthiness review and issues the ARC specified in point ML.A.901 (b)(4), the Airworthiness Review Certificate and documented review described in M.A.710(a) shall be retained by the owner until it has been superseded by another airworthiness review."

response

comment *282* comment by: *UK CAA*

Page No: 36

Paragraph No: ML.A.901 (b)(4), Aircraft airworthiness review

Comment: The proposed change to allow Part 66 certifying staff to carry out the annual inspection, airworthiness review and review of the AMP is seen as a potentially positive move in line with providing a simple, proportional rule. Without the involvement of

approved organisations, and with only limited reference to the Competent Authority, the Part 66 licence holder is now the only point within the regulatory system at which the airworthiness of an aircraft is established. . It is therefore vitally important that the individual is suitably experienced and fully competent to carry out this task. A Part 66 licence, on its own, does not ensure that the individual has the necessary understanding and knowledge to complete an airworthiness review or to review the adequacy of the content of an AMP. A demonstration of competence should be required before allowing individuals to independently perform an airworthiness review.

The ideal solution would be to include a relevant knowledge and experience requirements in the Part 66 license requirements.

Justification: To maintain an adequate level of safety assurance within the European regulatory system.

Proposed Text:

Replace the current text for (b)(4) with the following:

"(4) for sailplanes, balloons, hot-air airships and ELA1 aeroplanes, operated under Part-NCO rules, the certifying staff performing the annual inspection contained in the AMP, when appropriately authorised:
An Airworthiness review authorisation will be provided when:
(a) An application for an airworthiness review authorisation is made on a form and in a manner prescribed by the Competent Authority.
(b) To be eligible for an airworthiness review authorisation, an applicant must -
(1) Hold a Part 66 licence which is currently effective and has been in effect for a total of at least 3 years;
and
(2) Have been actively engaged, for at least the 2-year period before the date of application, in maintaining aircraft in accordance with their licence;
and
(3) Perform an airworthiness review under the supervision of the competent authority. Demonstrating their ability to carry out an airworthiness review and review of a maintenance programme in accordance with Part-ML, including the applicable cross-referred parts of Part-M. Individuals previously approved by a CAMO or as an approved certifying staff in accordance with M.A.901(g) will be accepted as meeting this requirement.

Authorisation: Privileges.
The holder of an airworthiness review authorisation may:
(1) Perform an annual inspection in accordance with the aircraft maintenance programme, and,
(2) Carry out a review of the maintenance programme, and
(3) Carry out an airworthiness review on the aircraft, and if the review is satisfactory and the aircraft is airworthy issue the ARC"

response

comment *283* comment by: *UK CAA*

Page No: 36

Paragraph No: ML.A.901(b)(4), penultimate paragraph, Scope

Comment: The proposed restriction on the validity of an ARC issued by personnel not licenced in accordance with Part 66 when transferring the aircraft to another Member State, appears to be unjustified and could be considered not to align with the principle that there should be free movement of goods and services within the EU. Aircraft holding a valid EASA CofA and ARC are entitled to circulate freely within the EU.

Justification: Free movement of goods and services within the EU.

Proposed Text: Delete the penultimate paragraph of ML.A.901(b)(4)

response

comment *293* comment by: *Luftfahrt-Bundesamt*

ML.A.901(b)
Replace
"The airworthiness review and the issuance of the ARC shall be performed in accordance with point M.A.710 of Part-M by:…"
with
"The airworthiness review and the issuance of the ARC shall be performed in accordance with point M.A.710 of Part-M and may be performed by: …"
Since there are options on the organisation/person that may perform the airworthiness review under the given circumstances, this optional approach should be reflected in the wording.

Relation between ML.A.903(b) and ML.A.901(b)(4)-last paragraph
While ML.A.903(b) requires the ARC issued in the other MS to continue to be valid in case of aircraft transfer within the EU, ML.A.901(b)(4) does not see mutual recognition of the ARC in case of transfer. Therefore they are somewhat contradictory statements.

response

comment *317* comment by: *Jos TREHERN*

This is supported.

response

comment *362* comment by: *CAA Finland*

ML.A.901 (b)(4)(iii) Should any Part-66 license holder be qualified to perform Airworthiness Reviews by just self-study, or should some kind of authorization be required? Revocation, suspension or limitation of the aircraft maintenance licence is very difficult and time consuming in case of problems.

ML.A.901 (c)(2) We should allow maintenance by independent certifying staff, also other

	than pilot-owner tasks, so that Aircraft stays in controlled environment (except when maintenance organization is required).
response	

comment	*412* comment by: *Swedish Transport Agency* ML.A.901(b)(4) Instead of give the privilege to independent certifying staff to perform the airworthiness review we propose to extend the privilege for the current M.A.901(g) airworthiness review staff to include ELA2 aircraft and helicopters certified for up to 4 occupants and up to 1 200 kg MTOM, operated under the Part-NCO rules. They should also have the privilege to issue the ARC.
response	

comment	*413* comment by: *Swedish Transport Agency* ML.A.901(b)(4) **Airworthiness review records for independent CS.** What is the requirement for airworthiness review records? There is no equivalent requirement/description as M.A.614(c), M.A.714 (b), 145.A.55(c) for the independent CS or M.A.901(g).
response	

comment	*429* comment by: *FAA* Page 36 Section: Whenever circumstances reveal the existence of a potential safety threat, the competent authority shall carry out the airworthiness review and issue the ARC itself. Comment: Does the competent authority perform the work themselves or enlist the aid of a CAMO as an example? May want to consider clarification.
response	

comment	*448* comment by: *Dutch gliding association* Until Part 66 L is fully in force for ELA 2 aircraft, it must be possible for certifying staff with a national licence to issue an ARC on aircraft with a foreign registration. Furthermore is very strange that an EASA ARC is not recognised in another EASA Member State.
response	

comment	*487* comment by: *CAA Norway*

The proposal for a Part-ML is in general very welcome and good.

Whether the aircraft should be marked (with a placard, for example) indicating that the aircraft is subject to the alleviated continuing airworthiness requirements of the Part-ML. CAA-N does not see the need it, and are unsure of the effectiveness as this will be something in a gray area in between standard and experimental. However there must be some kind of ML-classification in the technical record system.

For the proposed ML.A.901 (b)(4)
There seems to be unbalance between requirements for a standalone Part-66 to have automatic AR privileges, when Part-145/Subp-F needs special approval to issue the same Airworthiness Review Certificate. Also compared with the (old) ELA1 approval and FAA Inspector Authorization system required to perform the Annual inspection.

At least this proposal should be limited to be valid for airworthiness reviews of aircraft registered in that Member State and the ARC will not benefit from mutual recognition when transferring the aircraft to another Member State.

This also because today when performing GA ACAM's we have some difference issues and have more workload with GA camo's from other member states to follow up. If this open ups to include standalone Part-66 to have automatic AR privileges without formal approval requirement we think the burden on the NAA's will restrict the possibilities to have a good working GA ACAM system.

RGDS
Bjørn Erling Hanssen
Head of GA Airworthiness
CAA-Norway

response	

comment	*504* comment by: *Belgian CAA*

1. ML.A.901 (b (2) to (4):

   a) For sailplanes, balloons, hot-air airships and ELA1 airplanes operated under Part-NCO rules, Part-ML proposes to have the review performed by independent certifying staff and doesn't require any specific approval by Authority of those certifying staff.

   It is would not be clear why for similar types of aircraft a Part-145 or a Part-M Subpart-F needs to be approved (procedures/supervised review) while for an independent staff (with somehow no oversight of CAA) no specific approval is required.

   For this subject, the BCAA prefers to keep the situation as currently foreseen in Part-M. The BCAA considers that it is important that any person who can perform the airworthiness review and issue the ARC be a person (AR staff) formally accepted by the competent authority.

   In addition, not requiring a formal approval by the CAA could maybe be in conflict with results of other ongoing rulemaking tasks.

   b) Independent of the remark insisting on the necessity of a formal approval of AR staff, in the proposed Part-ML, since no prior approval of the CAA seems not to be required for the independent certifying staff, the purpose of requiring prerequisites stated in ML.A.904 (b)(4) (ii) such as : knowledge by self-study/training of Part-ML, is not clear.

response

comment *525* comment by: *European Balloon Federation*

ML.A.901 (b)
EBF welcomes this extension to permit the ARC to be issued by the MO or independent staff and supports the text as written.
However, it does serve to highlight the fact that part M-L is a work around, to circumvent some of the restrictions from the BR and part M. A balloon inspector whose hat he is wearing when signing off the inspection/ARC based on the most expedient circumstance to suit the implementing rules, when the work being done is exactly the same.
Better solutions would involve the elimination of the ARC and the transfer of relevant part M and ML requirements into a separate part-balloons.

response

comment *562* comment by: *GIPAG France (French General Aviation Operators Professional Union)*

The GIPAG France agrees to combine the annual visit with the ARC but only within an approved framework in order to keep the privileges higher to the approved maintenance organisation compared to those given to the independent mechanics. It is mandatory today

	to focus on the European Air Transport level-playing field and to achieve a rise of the level of safety. GIPAG France wants and agrees to combine the annual visit with the ARC. And if the aircraft is maintained in approved framework and monitored by a CAMO, the aircraft will be exempted from CEN extension and from the review of airworthiness. The aircraft airworthiness will be ensured by the annual visit. It has been pointed out also that requiring independence or overall authority from the continuing airworthiness of the aircraft concerned may be too demanding for small organisations: - The mechanic will only have overall authority if he is the owner of the aircraft (for aircraft not managed by CAMOs); - The cases where the maintenance organisation performs airworthiness management tasks for the owner are frequent and independence is difficult to achieve within small organisations (for example: one man organisation)
response	

comment	*563* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland* If the ARC is to be issued after the airworthiness review, should not MLA.710 be adopted accordingly?
response	

comment	*566* comment by: *Cameron Balloons Ltd* In general I think this is a good way forward. However the one thing that is very clear is that experinece in carrying out airworthiness reviews is very important, it can not be learnt from studying books!
response	

comment	*589* comment by: *Colin Wolstenholme* I supput this - it negates the 3 year dealy on new inspectors issuing ARCS.
response	

comment	*619* comment by: *FNAM (French Aviation Industry Federation)* The FNAM agrees to combine the annual visit with the ARC but only within an approved framework in order to keep the privileges higher to the approved maintenance organisation compared to those given to the independent mechanics. It is mandatory today to focus on the European Air Transport level-playing field and to achieve a rise of the level of safety. FNAM wants and agrees to combine the annual visit with the ARC. And if the aircraft is maintained in approved framework and monitored by a CAMO, the aircraft will be exempted from CEN extension and from the review of airworthiness. The aircraft airworthiness will be ensured by the annual visit. It has been pointed out also that requiring independence or overall authority from the continuing airworthiness of the aircraft concerned may be too demanding for small organisations:

	- The mechanic will only have overall authority if he is the owner of the aircraft (for aircraft not managed by CAMOs); - The cases where the maintenance organisation performs airworthiness management tasks for the owner are frequent and independence is difficult to achieve within small organisations (for example: one man organisation)
response	

comment	*650* comment by: *DGAC France* In order to be sure that the individual has really the adequate competencies, DGAC France proposes to add (iii) after ML.A.901 (b) (4) (ii) written as follows : " (iii) after satisfactory completion of an airworthiness review under the supervision of the competent authority"
response	

comment	*715* comment by: *Quality Manager Easy Balloons Ltd* PAGE 36 – highlight whole page (b) The airworthiness review and the issuance of the ARC shall be performed in accordance with point M.A.710 of Part-M by: (1) the competent authority; or (2) a CAMO; or (3) the approved maintenance organisation performing the annual inspection contained in the AMP, while in compliance with the requirements contained in point M.A.901(l) of Part-M; or (4) for sailplanes, balloons, hot-air airships and ELA1 aeroplanes, operated under Part-NCO rules, the certifying staff performing the annual inspection contained in the AMP, when: (i) holding a Part-66 licence rated for the corresponding aircraft; and (ii) having acquired knowledge, either by self-study, training or experience, of the parts of Part-ML relevant to continuing airworthiness management, performance of airworthiness reviews and issue of ARCs, including the applicable cross-referred parts of Part-M. For aircraft where there is no Part-66 licence applicable, the certifying staff qualification of the State of Registry is an acceptable alternative, except that this is only valid for airworthiness reviews of aircraft registered in that Member State and the ARC will not benefit from mutual recognition when transferring the aircraft to another Member State. Broadly agree however 4(ii) is confusing. If it means that 'individuals' outside of CAMOs can only issue ARCs for their own state of registration that seems OK but if it limits Inspectors working for CAMOs from issuing ARCs ooutside of their home country then it will have an impact on existing business. I see no reason why there can be no mutual recognition by other Member States. I was under the impression that EASA was supposed to make life simpler and be acceptable in all Member States. This makes it more complicated.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.902 Validity of the airworthiness review certificate p. 37

comment	*583* comment by: *Irish Aviation Authority* ML.A.902 (b) (5) Suggest "a modification or repair is not in compliance with Part-21" be reworded to "a modification or repair embodied on the aircraft is not in compliance with Part-21 requirements" for consistency with the other points in this section.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.903 Transfer of aircraft registration within the EU p. 37

comment	*294* comment by: *Luftfahrt-Bundesamt* *Relation between ML.A.903(b) and ML.A.901(b)(4)-last paragraph* While ML.A.903(b) requires the ARC issued in the other MS to continue to be valid in case of aircraft transfer within the EU, ML.A.901(b)(4) does not see mutual recognition of the ARC in case of transfer. Therefore they are somewhat contradictory statements.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.A.904 Airworthiness review of aircraft imported within the EU p. 37-38

comment	*190* comment by: *Luftsport Verband Bayern / Germany* Title: "Airworthiness review of aircraft imported **into** the EU" ??
response	

comment	*246* comment by: *CAA-NL* **ML.A.904 Airworthiness review of aircraft import within the EU** · We suggest to change the title into 'Airworthiness review of aircraft import **into** the EU' The word within may cause confusion for the non English speakers who might understand this as a transfer from one EU member state to another EU member state. · Further we suggest to include the words 'competent authority' in the last line of (b), in (c) and (d) just before the words 'Member State of Registry'. · Item (d) is now written as a requirement for the Competent Authority, so it needs to be transferred to Section B or rephrased.
response	

comment	*284* comment by: *UK CAA*

Page No: 37

Paragraph No: ML.A.904, Airworthiness review of aircraft imported within the EU

Comment: The text for ML.A.904 is for aircraft imported into the EU (ML.A.903 refers to aircraft transfers within the EU), the paragraph heading is therefore incorrect.

Justification: Text correction.

Proposed Text: Amend paragraph heading to read:

"ML.A.904 Airworthiness review of aircraft imported ~~within~~ **into** the EU**"**

response

comment *408* comment by: *Swedish Transport Agency*

ML.A.904(b)
STA do not support the possibility for independent certifying staff.

response

comment *505* comment by: *Belgian CAA*

ML.A.904 (b) : the reference to the competent authority seems not applicable. Indeed, for us, when the Airworthiness Review is performed by the competent authority, it is the competent authority of registry and consequently the submission of a copy to the Member state of registry is not applicable.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.B.101 Scope p. 38

comment *255* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016*

Section B is interessed wether for Part-M and Part-ML.
In Germany ORO.GEN.210, ORO.AOC.135, ORO.GEN.200/210... has to be fullfiled for Part M.A.706 (accounable manager). Experience in the job is minimum five years to be an accountable manager.
Now, the LBA has a lot of unskilled/qualified staff for audits and issues. Many so-called "auditors" are about mid-twenty, never have seen an aircraft or have had worked at an aircraft maintenance site. They only have a two-week seminar to audit a 20 year experiance work shop. This is a big, big problem!!!

At first, please qualify your authorities and than define a section B.

response

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.B.303 Aircraft continuing airworthiness monitoring p. 39

comment	*182* comment by: *Claude Lelaie* **ML.B 303**: A sentence should be added to avoid a full detailled inspection lasting more than 4 hours on a general aviation aircraft. It may be indicated in the AMC that the inspection should be limited to sample checks in the various domains.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — ML.B.903 Findings p. 40

comment	*434* comment by: *The Finnish Aeronautical Association* Comment to "4. requires the use of special tools, calibrated tools (except torque wrench and crimping tool); and/or" Question: Why not include calipers and micrometers in this exception list, in cases where the absolute measurement is not relevant? For example, in the check of the L'Hotellier ball connector widely used in sailplanes, the out-of-roundness is measured, not the absolute dimension in millimetres. This does not require a calibrated tool.
response	

comment	*435* comment by: *The Finnish Aeronautical Association* We suggest EASA to strongly consider extending the pilot-owner maintenance privileges to cover also regular 100h and annual maintenance tasks, in cases where the manufacturer has approved it.
response	

3. Proposed amendments — 3.1. Draft Regulation (Draft EASA Opinion) — 3.1.3. New Annex VI (Part-ML) to Regulation (EU) No 1321/2014 — Appendix I — Limited Pilot-owner maintenance p. 40-41

comment	*14* comment by: *Ulrich NIGGLI* Until now, the annual inspection and maintenance can be done by the pilot/owner, if no tasks listed in the maintenance manual are outside the scope of POM. Forbiding this will pose a big problem and a financial impact to many clubs. In the original Part-M it says: “A 50 Hrs/6 Month periodic inspection for a fixed wing aeroplane as well as the one- year inspection on a glider may normally be eligible for Pilot-owner maintenance. ”
response	

comment	*165* comment by: *DE LOOF JEAN PIERRE* 9. This restriction prevents Pilot-Owner to achieve any task defined in the Minimum Inspection Programme ! Cleaning of the aicraft is included in this MIP ! Does it means that at least once a year, or every 100 hours, the aircraft must be fully maintened by appropriate certifying staff only ? This is to restrictive and in contradiction with ML.A 803(b) "For aircraft operated under Part NCO rules, the Pilot Owner may issue a CRS after limited Pilot Owner maintenance .." A new wording should be done to clarify the Pilote-Owner privilege
response	

comment	*201* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden* **"Point 9. is part of the annual inspection or 100-hour check defined in the Minimum Inspection Programme described in ML.A.302(d)."** This must be removed. If the pilot-owner can not complete any of these tasks then there is little use of this. 80-90 % of tasks performed during a normal year are things related to this. This is in opposite directon of the GA Road Map. There is some sense to make a mechanic look at it every annual but a 100-hr check without complex maintenance tasks can definitely be done by the pilot-owner.
response	

comment	*203* comment by: *WESERTRAINER FLIGHT TRAINING* **Limited Pilot Owner Maintenance has to be adjusted to be proportionate to the low degree of complexity and the risk assessment of aircraft affected by Part ML (ELA1 and ELA2).** **1). Release of tasks versus carrying out tasks** Generally there should be made a difference between **the Performance of tasks** by the *Pilot-owner* **and the Release of performed tasks** by the *Pilot-owner.* Otherwise national authorities could interpret, that the Pilot-owner is only allowed to carry out maintenance task wich can also released be the Pilot-owner. The pilot owner should be allowed to perform any task as far as permitted by the certifying staff responsible for the supervision and the release of the of the work carried out. **2.) Scope of Maintenance allowed to be released to service by Pilot-owner** The pilot owner should be allowed to release all maintenance other than Complex Maintenance Tasks defined in Part M Appendix VII. This would be proportionate to the low

degree of complexity and the risk assessment of affected aircraft.

3.) Exclusion of AD or ALS based tasks from Pilot Owner Maintenance (b) Tasks No. 3. has to be removed anyway

Many AD or ALS based tasks are simple visual checks (e.g. my aircraft: Inspection of seatrails by use of a gage, visual inspection of induction airfilter seal at mounting frame) . Restriction on this task should depend on whether it is a complex task or not respectively it is restricted in someway else (See new item " C) Release to service" introduced by me later on in this comment)

4.) Exclusion of System tests from Pilot Owner Maintenance (b) Tasks No.5. has to be removed anyway

Many system tests are simple to carry out. If a test is difficult to carry out or special equipment is required the owner will have to ask the shop anyway in most cases.

5.) Exclusion of performing tasks part of Annual or 100h check contained in the Minimum Inspection Programme from Pilot Owner Maintenance (b) Tasks 9. has to be removed anyway

Approximately 80 % of the standard servicing and maintenance tasks are part of the 100h inspection so 80 % of the Pilot Owner Maintenance would no longer be allowed.

The 100h / Annual is the major inspection and the moment in time to work on many details and performing small repairs, paint repairs etc. Today I perform the Annual / 100h by myself in my hangar, every 12 month CAMO's airworthiness review staff additionally performs a survey, all AD based inspections and the avionic functional test (required by german requirements) at the CAMO facility.

To perform a meticulous 100h inspection approximately up to three mechanic-days are be required. When a shop-organisation will do it, this will lead to approximately 2000 € cost additionally for a Cessna 172 . Also required repairs can not be performed by the owner himself during inspection in the shop because the shop's quality management system approved by the competent authority does not allow any tasks to be performed by non-shop-staff in the shop without notice of the Quality-Management-Handbook.

The Piot-owner should be allowed to perform and release 100h inspections as far as no complex task has to be carried out. At Annual as part of a Minimum Inspection Program the Pilot-Owner should be allowed to perfrom tasks under supervision of certifing staff releasing these tasks later.

This would lead to a dramaticily increase of costs. One of the measures to revitalize europe's lighter end of GA on the GA road map is the extension of Pilot Owner Maintenance. By this we would move in the opposite direction !

6.) Suggested Changes

From this point of view I would suggest the following changes (typed in bold)

Appendix I, Limited Pilot Owner Maintenance

[...]

(b) should be completely replaced by:

(b) Tasks

The pilot owner may carry out

1. any maintenance task other than complex maintenance tasks defined in Appendix VII or is a component maintenance task in accordance with points ML.A.502(a) or (b).

2. any complex maintenance task and any component maintenance task under supervision of the certifying staff responsible for the release of the task carried out.

A point "c" should be added:

(c) Release to service

Maintenance tasks shall not be released to service by the Pilot owner when the task:

1. is critically safety-related, whose incorrect performance will drastically affect the airworthiness of the aircraft or is a flight sensitive task as specified on point ML.A.402(a); and/or

2. requires the removal of major components or major assembly (fin, rudder, stabilizer, elevator, wings, steering-system, engine, propeller) and/or

3. requires the use of test equipment needing special qualification and approval or special testing (e.g. Non Destructive Testing (NDT) or operational tests of avionic equipment; and/or

4. is composed of any unscheduled special inspection (e.g. heavy landing check), and/or

5. is affecting systems essential for the IFR operation; and / or

6. is a complex maintenance task in accordance to Appendix VII to Part M or is a component maintenance task in accordance to point ML.A.502(a) or (b);

7. - for aircraft other than ELA 1: - is part of the annual inspection defined in the Minimum Inspection Program

(c) has to be shifted to point

(d) Performance of maintenance of Pilot-owner tasks and records

[...]

response

comment *247* comment by: *CAA-NL*

Appendix I (b)(1).
Safety sensitive tasks are not specified in ML.A.402(a). Critical maintenance task will be defined in the next amendment of the Cover Regulation to Part M.

response

comment *329* comment by: *The Norwegian Air Sports Federation*

(b) Tasks:

NLF believes the following limitations should be altered:

4: The limitation linked to the use of special tools should be removed. The pilot-owner is by the core of this regulation trusted to evaluate whether or not he/she is capable of performing aircraft maintenance within a limited scope. Special tools in themselves do not constitute a danger or risk. On the contrary, a person able to be using special tools is more likely to be qualified in the first place. The mere access to special tools makes such an assumption even more likely.

For example: Tools to bleed brakes are not very complicated – please check this video:

http://www.eaavideo.org/video.aspx?v=2520164560001

5: This limitation linked to the use of special testing should be removed. The pilot-owner is by the core of this regulation trusted to evaluate whether or not he/she is capable of performing aircraft maintenance within a limited scope. Testing in itself does not constitute a danger or risk. On the contrary, a person able to understand a test procedure is more likely to be qualified. For instance checking the pitot-static system is not by any means a challenging tasks.

As another example, tools to measure propeller vibration can safely be used by most pilot-owners, at the very least for measurement purposes, as demonstrated here:

https://www.youtube.com/watch?v=iIZ0fkAuoIU

7: The expression "the task is affecting systems essential for IFR operations" is not very concicse and can easily be misinterpreted. Which system on an aircraft is not essential for IFR operations under an IFR flight? The current limitation meaning that a pilot-owner cannot replace the main aircraft battery, just because the aircraft is operated under IFR, is disproportionately strict and may cause adverse safety effects. Please keep in mind that an aircraft battery by instructions need to be taken out of the aircraft to be charged with an external charger. Such external charging can then not take place for IFR operated aircraft. The consequence may be:

* The pilot-owner won't top up the battery charge during cold months or after months of disuse, because there is no certifying staff around to take out and re-insert the battery. This leaves less of a redundancy in case the alternator fails during IFR flight.

* The pilot-owner may have chosen to top up the battery charge despite the above, but will then be forced out of the IFR option afterwards, even though IFR may be the safest choice for a certain flight.

* The pilot-owner is discouraged from frequent battery replacements or service.

We propose the following sentence instead:

"the task is performed on navigation systems or situational awareness instruments essential for IFR operations; and/or"

9: This limitation should be removed entirely for 100 hr-checks, and for annual inspections as long as the airworthiness review is performed by a an appropriately licensed person at the same time as the annual inspection. It is the nature of the task that should impose a limitation, not at which junction the task is required. By having a professional set of eyes overlooking the annual inspection, the risk ought to be minimal.

response

comment *367* comment by: *CAA Finland*

(b) Tasks 9. If AMP is based in DAH pilot-owner may carry out annual inspection (no complex tasks or ADs), but if AMP is MIP based it is not possible. This is problem especially with gliders, when only maintenance is mainly annual inspection.

response

comment *506* comment by: *Belgian CAA*

1. Appendix I (a) (3) : The responsibility of identifying pilot-owner tasks is stated but how could this be manageable since in the AMC ML.A.302 content (Part-ML Aircraft Maintenance Programme), the there is no area foreseen for the identification of all the tasks done by the

	pilot-owner. The area foreseen is seems to be used only for the identification and signature of the pilot-owner in case there would be such tasks.
response	

comment	*584* comment by: *Irish Aviation Authority* Appendix I Limited Pilot Owner Maintenance (b) 7 – Can the "systems essential for the IFR operations" be clarified further please? Will the identification of such systems be obvious to the Pilot-owner performing maintenance?
response	

comment	*628* comment by: *EFLEVA* **We do not believe that Pilot-owners should be be precluded from carrying out appropriate maintenance tasks as part of the Annual/100 hour inspection. There is no clear safety reason for this restriction.** **See Page 40-41** **Appendix I** **Limited Pilot-owner maintenance** … Maintenance tasks shall not be carried out by the Pilot-owner when the task: 9. Is part of the annual inspection or 100-hour check defined in the Minimum Inspection Programme described in ML.A.302(d).
response	

comment	*670* comment by: *René Meier, Europe Air Sports* Appendix I Page 40 Remark: Delete “Limited” in the term as you did in other places in this NPA. Rationale: We are not "limited". Please see our arguments already presented in this NPA, thank you.
response	

comment	*671* comment by: *René Meier, Europe Air Sports* Anual/100 h/Routine tasks Page 40 Remark: This first paragraph has not much to do with maintenance. Rationale: It deals with outside and with operational checks, not more.

Question:
to the second sentence: Would it not be better to make positive statements in the sense of "Maintenance tasks shall only be carried out by the pilot-owner when the task:" and to change the entire wording in a positive way?

Should we make a new proposal what a pilot-owner may carry out? In the end, he/she always is responsible for the aircraft.

response

comment *672* comment by: *René Meier, Europe Air Sports*

6
4. requires the use…
Page 40
Remark:
This limitation linked to the use of special tools should be removed.

Rationale:
The pilot-owner is by the core of this regulation trusted to evaluate whether or not he/she is capable of performing aircraft maintenance within a limited scope. Special tools in themselves do not constitute a danger or risk. On the contrary, a person able to using special tools is more likely to be qualified. For instance, tools to air a break line system is of simple nature and used extensively by DIY car drivers.

response

comment *673* comment by: *René Meier, Europe Air Sports*

5. requires the use of test equipment
Page 40
Remark:
This limitation linked to the use of special testing should be removed.

Rationale:
The pilot-owner is by the core of this regulation trusted to evaluate whether or not he/she is capable of performing aircraft maintenance within a limited scope. Testing in itself does not constitute a danger or risk. On the contrary, a person able to understand a test procedure is more likely to be qualified. As an example: A pitot-static check is a very simple procedure, which owners ought to be well suited to do.

response

comment *674* comment by: *René Meier, Europe Air Sports*

7. is affecting systems…
Page 40
Remark:
This is not well defined.

Question:
Which system is not essential for IFR operations? Does really changing a battery constituting an unacceptable risk for a flight undertaken according to IFR?

response

comment *675* comment by: *René Meier, Europe Air Sports*

9. is part of…
Page 41
Remark:
Why not?

Rationale:
The pilot-owner always is fully responsible for his/her aircraft, nobody else. If the annual inspection is performed during an airworthiness review, the pilot-owner definitely is able to perform the maintenance, overlooked ARS.

response

comment *676* comment by: *René Meier, Europe Air Sports*

Nevertheless, the person assembling…
Page 41
Remark:
Delete this sentence.

Rationale:
Well, it always is the pilot in command who is responsible for his/her aircraft.

response

3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — AMC ML.1 General p. 42

comment *191* comment by: *Luftsport Verband Bayern / Germany*

The use of the AMP template in AMC ML.A.302 should not be mandatory. For simple aircraft this template is still to complex (to many unneccesary choices). Therefore it should be clearly stated that other formats are allowed (twice, for NCO-rules and non NCO-rules).

response

comment *677* comment by: *René Meier, Europe Air Sports*

AMC ML.1 General
Page 42
Remark:
We fully support this provision.

Rationale:
This solution is adequate for our operations, keeps costs down, is customer-oriented and will offer appropriate administrative procedures.

response

3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — GM ML.A.201(a) Responsibilities p. 42-43

comment *248* comment by: *CAA-NL*

GM ML.A.201(a) third indent
To be checked with the latest amendment of 1321-2014.

response

comment *507* comment by: *Belgian CAA*

1. GM ML.A.201 (a) : for the aircraft not operated under Part-NCO rules, there is still a reference to owner signed the AMP whereas the CAMO manage the continuing airworthiness. A clarification is required on this issue. Shouldn't the AMP be approved by Authority or CAMO if applicable?

response

comment *599* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

GM ML.A.201(a) Responsibilities
See also our comment under 2.3.1, number 7

response

3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — GM ML.A.201(d) Responsibilities p. 43

comment *430* comment by: *FAA*

Section:
If an owner decides not to make a contract in accordance with point ML.A.201(d), the owner is fully responsible for the proper accomplishment of the corresponding tasks. As a consequence, it is recommended that the owner properly self-assess his/her own competence to accomplish them or otherwise seek the proper expertise.

Comment:
Does criteria exist for the owner to self-assess their skills to perform maintenance? Is there a standard or evaluation checklist?
As part of the implementation of this rule, EASA may wish to develop guidance with criteria for the self assessment process.

response

comment *508* comment by: *Belgian CAA*

1. GM ML.A.201 (d): is it acceptable to consider that a "self-assessment" is sufficient? It could be safer to have an assessment from an independent party.

response

3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — AMC ML.A.302 Aircraft maintenance programme p. 43-47

comment *249* comment by: *CAA-NL*

AMC ML.A.302 AMP
· Table item 4, as well as Appendix B, life limited components to be aligned with the outcome of task RMT.027

· Table item 8, lessee is defined under ML.1 as falling under the owner, so can be deleted.

response

comment *256* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016*

Paper, paper, paper ... for what?

response

comment *372* comment by: *CAA Finland*

AMP template point 1 Aircraft identification, engine and propeller type information missing (see page 65. GM.ML.A.302 AMP).

response

comment *405* comment by: *Swedish Transport Agency*

Completion instructions
The AMP content in this NPA has been simplified so much that it may be beyond understanding for persons with less knowledge of Part-M/ML and maintenance programs (compared with the example from the CRD to NPA 2012-17 GATF 1).
We propose to revert to the template in CRD to NPA 2012-17 or make a detailed GM with completion instructions, "How to complete the AMP".

Indication of M.A.302(h) or ML.A.302
To make it clearer for all involved STA propose the AMP must clearly states if the AMP is developed accordance M.A.302(h), ML.A.302 or not.
One reason for this is to help the personnel involved in the airworthiness review to

understand if the annual review and the airworthiness review must be performed at the same event or not.

List of interval/tailor-made
If decided to use DAHD (section 2) the data must be entered (Manufacturer and revision) but not the different intervals?
(For example 50h, 100h, 200h and on…)
Is the intention to remove the requirement for tailor-made AMP?
When we read the AMP (from AMC ML.A.302) we got the feeling that it is only necessary to select (tick the box) for DAHD or MIP without listing the specific task in the AMP (Appendix A or B) or to add a separate tailor-made appendix for the selection.

Other MIP
What is another MIP. Please give an example.

Pilot-owner maintenance 1
It is unclear where to list pilot-owner maintenance (section 6). Should it be in Appendix B?
(In the CRD to NPA 2012-17 the pilot-owner maintenance task can be listed in table 1)

Pilot-owner maintenance 2
To make it clearer for the controlled environment (M.A.901(b), ML.A.901(c)) when using independent certifying staff, one possibility could be to list the independent 66 staff who perform the pilot-owner maintenance.

Section 7 and 8
Change position on section 7 (Approval/Declaration) and section 8 (Certification statement) to make it more logic.

response

comment *509* comment by: *Belgian CAA*

1. AMC ML.A.302: the proposed table for AMP does not contain any boxes for identification of deviation nor for identification of the list of the tasks to be performed by the pilot-owner when applicable.

response

comment *526* comment by: *European Balloon Federation*

AMC ML.A.302
Notwithstanding our wish to remove the separate AMP, EBF welcomes the standard template for the AMP. Its use should eliminate inconsistencies between NAAs of requirements for AMPs.

response

comment *587* comment by: *Irish Aviation Authority*

AMC ML.A.302 (3)

AMP Section 4.
Suggest "Continuing Airworthiness Information" be termed "Instructions for Continuing Airworthiness", for consistency and clarity.

response

comment *643* comment by: *EFLEVA*

EFLEVA do not consider that this level of detail is necessary in Part M-L. It is more appropriate to set general objectives and allow industry groups and aviation associations to provide detailed guidance, as in the approach suggested in a recent ANPA for the reorganisation of CS23.

response

3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — AMC ML.A.302(c) Aircraft maintenance programme p. 47-48

comment *146* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden*

Risk assessment "OPS approval": Commercial Flight Training should be removed from higher risk. The risks should be considered the same as Flight Training by an association. Both of which are Medium risk.

response

comment *257* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016*

Paper, paper, paper ...
Will be this an impact for more safety?

response

comment *285* comment by: *UK CAA*

Page No: 47

Paragraph No: AMC ML.A.302(c) Aircraft maintenance programme

Comment: The AMC to ML.A.302(c) does not explain how to apply the data contained in the tables. Some worked examples would assist in their correct application.

Justification: Clarity and consistent application of the AMC material.

response

comment *493* comment by: *WESERTRAINER FLIGHT TRAINING*

Risk Assessment - OPS approval

Commercial Flight Training has no higher risk than Flight Training by an association and vice versa.

There is no evidence for this classification

response

comment *510* comment by: *Belgian CAA*

1. AMC ML.A.302 (c) and GM ML.A.302: a justification for any deviations should be required if the AMP is covered by the owner declaration. If no justification is necessary, such an approach can be considered as not transparent and could induce a possible medium or high risk to safety.

response

comment *597* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

AMC ML.A.302(c) Aircraft maintenance programme
See also our comment under 2.3.1, number 9

response

comment *646* comment by: *DGAC France*

The proposal linked to the extension of TBO intervals and for the deviation from other DAH's recommendations is based on FOCA's approach. Although the proposal gives a way forward in helping CAMOs and competent authorities, it remains very general, whereas the Swiss practical way of implementing it is more useful (when studying all the aspects, specific notes are given and with the results you directly know the extension you can allow). DGAC France would have preferred the complete Swiss approach, more practical, to be given as an AMC.

response

comment *693* comment by: *European Sailplane Manufacturers*

The tool to conduct a safety risk analysis by looking for higher / lower risk factors is useful in this AMC but needs better explanation.

For instance it could be stated that the CAMO / owner / entity which is evaluating to defer certain tasks as recommended by the manufacturer should at least consider such a risk analysis.

It could be further stated that even if this rule does now allow even a complete deferral of TBO´s it is in the end the owner who will be responsible and might have the disadvantage of technical problems, less coverage from his insurance or more costs at the next overhaul or maintenance.

The manufacturer accept that such a decision should and could be made by the owner, but it

must become clear to the owner that the possibly associated risks need at least to be assessed.

Ideally the owner would list all deviations from recommendations and would add a personal remark that in each single case he/she understands possible implications and accepts the consequences.
This needs not to be such a safety analysis for each case but at least a short remark.

response

comment *716* comment by: *Quality Manager Easy Balloons Ltd*

Part ML Aircraft Maintenance Programme

This is a real step backwards as the amount of form filling and paperwork is increased. The EASA definition of basic is far closer to complicated. How will EASA certify or check the competence of an inspector/CAMO or such from being able to make a Risk Assessment and applying them?

response

3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — AMC ML.A.302(d) Aircraft maintenance programme p. 48-65

comment *11* comment by: *Guillaume SUDRE*

MIP mandates every 100 H / Annual :
"Pitot-static system / Transponder : Perform operational check"

Please explicit "operational check".

Is a flight in coordination with ATC to test the altitude encoding system an acceptable means of compliance ?

Today, the French CAA mandates Pitot-static system / transponder ground check every **two** years.
In the US, the FAA mandates Pitot-static system check every **two** years for aircraft flying IFR.

If you mandate a complete ground check every year in Part-ML this is a serious step backward compared to Part-M.

It would be extremly strange to mandate this check every year as EASA SIB 2011-15R2 only recommend a check every 2 years.

Is there any safety record showing that a check every two years is not enough ?

response

comment *18* comment by: *Ulrich NIGGLI*

	Minimum Inspection Program powered sailplanes: The most often used engine in sustainer powered sailplanes is the Solo 2350. The measurement of compression is not even part of the thorough inspection every 5 years, and isn't recommended at any interval. Maybe it would be the best to have the MIP engine part reviewed by Solo?
response	

comment	*83* comment by: *BPvL/AEI* Internal engine If cylinder compression is low, we shall inspect for improper internal tolerances. How can we do this? Opening the crankcase is only allowed for an overhaul-shop. A better inspection task would be: With the tester and pressure connected check for air rushing noise at exaust (valve not closing tight) or oil filler neck (worn piston rings and/or cylinder barrel)- Warning: Stay outside propeller turning area!
response	

comment	*145* comment by: *Niklas Larsson - Member of GA Task Force, representing AOPA Sweden* **Operational checks for pitot-static system and transponder:** This should be further clarified. It should not be required to use expensive pitot-static test equipment. A taxi run or similar for pitot-static should be enough to satisfy the certifying staff. If the owner has not remarked on any abnormalities in either of these systems, this is a simple, practical and proportionate way of assessing it.
response	

comment	*193* comment by: *Luftsport Verband Bayern / Germany* Comment on the ELA2 sailplanes and ELA2 powered sailplanes Minimum Inspection Programme **Control deflections & …. – Check and record range of movement and ….** Why recording is required at gliders? Is the control system different to the one used at airplanes?
response	

comment	*194* comment by: *Luftsport Verband Bayern / Germany* Comment on the ELA2 sailplanes and ELA2 powered sailplanes Minimum Inspection Programme **Air speed indicator calibration – carry out calibration of the airspeed indicator ….** This is neither a requirement of the instrument manufacturers nor one of the sailplane manufacturers.

	This is an additional burden for the community. According to M.A.402 (b) all tools have to be controlled and calibrated. So all CS has to buy calibrated airspeed indicators and have them periodically calibrated (indication much better than 2%, costs ~1000€ each, sums up to approx.. 60.000€ for the CS staff of the Luftsport-Verband Bayern). How does this correlate to the approach of EASA to make things easier? How is this requirement justified? Do we have a field problem with airspeed indicators?
response	

comment	*195* comment by: *Luftsport Verband Bayern / Germany* Comment on the ELA2 sailplanes and ELA2 powered sailplanes Minimum Inspection Programme Powerplant This section is only "designed" for self sustaining powered gliders. TMG should use the MIP for aeroplanes.
response	

comment	*196* comment by: *Luftsport Verband Bayern / Germany* Comment on the ELA2 sailplanes and ELA2 powered sailplanes Minimum Inspection Programme **Engine battery – carry out capacity test. Refer to appropriate manual or guidance.** This is not a requirement of the (powered) sailplane manufacturers. How is this requirement justified? Is there a field problem with defect batteries? What test method should be carried out (capacity or CCA)? According to batteryuniversity.com these tests have an accuracy close to guessing (+/- 15%), so the same battery can be either damaged (65%) or quite good (95%) when being tested twice under laboratory conditions! According to M.A.402 (b) all tools have to be controlled and calibrated against an officially recognised standard. There is no such standard (how should it be with the above mentioned test results?). This is again an additional burden for the community to buy such testing devices. For a semi professional tester the price is between 300 and 1300€ (sums up between 18.000€ and 78.000€ for the CS staff of the Luftsport-Verband Bayern). And then one CS has a tester for one battery type, (e.g. lead accu), and requires others for NiCd accu, LiMH …
response	

comment	*197* comment by: *Luftsport Verband Bayern / Germany* This check is missing in the powerplant section of the ELA2 sailplanes and ELA2 powered sailplanes Minimum Inspection Programme "Flexible vibration dampers - Check for poor condition and deterioration"

response

comment *258* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016*

At first you have a maintenance program. Now you have Minimum Maintence program.
Sorry, nobody will understand this...
Please cancell all the actives in case of maintenance programs!!!

response

comment *259* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016*

Paper, paper, paper ...

response

comment *368* comment by: *CAA Finland*

MIP for ELA2 aeroplanes Powerplant task: engine timing, spark plugs, oil and air filters inspections are missing, Operational: mixture check missing. Usually the last point when the engine is shut off.

MIP for sailplanes Avionics and Electrics, Air speed indicator calibration and Altimeter datum are not in line with other tasks. How the calibration and altimeter datum check will be performed. Check of these items are missing from the MIP of ELA2 aeroplanes.

response

comment *511* comment by: *Belgian CAA*

1. AMC ML.A.302 (d): for the fuselage structure, for example, there is no information concerning the inspection for crack or any damage other than only corrosion. It could be more appropriate to have a look also for other damage than corrosion. Same kind of remark for the "retracting and locking mechanism", no reference to an inspection for general condition (defects, crack,…). Same for "fuel tanks", concerning the check for leaks/cracks. Same kind of remark for the table in page 55 ("fuselage structure", "nose fairing").

response

comment *629* comment by: *EFLEVA*

EFLEVA does not agree that it is necessary to weigh an ELA2 aeroplane at every annual inspection. E.g.
Pag
AMC Page 49. AMC.M.L.A.302(d) Aircraft maintenance programme, Minimum Inspection Programme for ELA2 aeroplanes Row 5] Weighing: Weigh the aircraft as required by the Part-NCO rules [*which require weighing at every annual*]

response

comment	*642* comment by: *EFLEVA* EFLEVA do not consider that this level of detail is necessary in Part M-L. It is more appropriate to set general objectives and allow industry groups and aviation associations to provide detailed guidance, as in the approach suggested in a recent ANPA for the reorganisation of CS23.
response	

comment	*678* comment by: *René Meier, Europe Air Sports* AMC ML.A.302(d) Page 48 ELA2 Question: Is this formula clear to all readers? There are some doubts...
response	

comment	*717* comment by: *Quality Manager Easy Balloons Ltd* This does no more than précis the Manufacturers' Maintenance Manual. It is both onerous, inaccurate, leaves out essentials and makes suggestions on carrying out maintenance which it should not. This will simply make it more confusing for the owner as it suggests that MM does not necessarily have to be used. What is wrong with following the Manufacturers' instructions first and fullmost? Not Agreed. In the case of Annex II balloons there is no reason why the Regulations that exempt them from some Regulations should not be recognized by all the Member States so that they can be flown in other Member State countries other than their own. It makes no logical sense that the EASA exists with Regulated rules and de-Regulated rules. I fully support Regulations placed on Balloons being used for paid passenger flights. It has been demonstrated by the lack of accidents in the UK and confidence placed in the Balloon Ride Industry by passengers that it is beneficial to safety and having matured over the years is now reasonably straightforward with oversight simple. Removing the CAMO requirement would make it extremely difficult for a NAA to close or shut down a Ride Operator who seriously transgressed the Regulations even for a short period. For Privately operated balloons, as a company we have striven to keep it as simple as possible for our customers and the system in place runs well and most now understand and accept the Requirements. My big concern is that even if the Regulations are relaxed Approvals will still be required and the costs will not come down. Removing the ARC or Maintenance Programme is unlikely to reduce those costs and the revenue from ARCs will simply have to be put onto something else. Although I broadly agree with the BBAC's stance I would suggest that we have seen a slight resurgence in the sport side especially with the smaller lighter kit now finally coming onto the market. Any decline now tends to be amongst those that are now getting older and would have given up the sport anyway. For a few years after EASA came in there was a decidedly large downturn in the sport and much frustration at the new rules and regulations

that were introduced. Now it is the accepted norm for both those still in it and those new to it. There is of course no where near the expendable capital that there was in the eighties and nineties and as a result general aviation has suffered badly.

This NPA could actually make matters worse unless it is carefully thought through and those that operate in the Sector are actually listened to.

response

3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — GM ML.A.302 Aircraft maintenance programme p. 65-67

comment *406* comment by: *Swedish Transport Agency*

When you read the GM, it may be interpreted that the CAMO or AMO are allowed to approve deviations in the AMP.

Clarify that deviations in the AMP always shall be approved by the competent authority when it is not declared by the owner.

response

comment *512* comment by: *Belgian CAA*

1
1. GM ML.A.302 (d) :
a) Concerning the deficiencies on AMP notified to the competent authority, we consider that the ACAM program is just a preventive action but it is also very important that the authority ensure that the responsible of the AMP took the adequate corrective/preventive actions. Therefore the owner should provide a copy of the AMP to the CAA and the ensure correction of discrepancies

b) Instructions stated in this paragraph regarding the necessity of reviewing/adapting ACAM program depending should be put into section B of Part-M.

response

comment *513* comment by: *Belgian CAA*

1. GM ML.A.302 : concerning the copy of the AMP to be send to the authority or not, the paragraph “Although there is no requirement for the owner to send…” is very confusing. Indeed, it is stated there is no requirement for the owner but in the same time the authority can request a copy ?

response

comment *514* comment by: *Belgian CAA*

1. GM ML.A.302 : concerning the text : “since the maintenance programme has to identify

	the deviation…", it seems this information is not always in the AMP taking into account the AMC ML.A.302 (see earlier comment).
response	

3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — AMC ML.A.803 Pilot-owner authorisation p. 67

comment	*355* comment by: *Howard Torode* Comment by European Gliding Union *'For aircraft operated under NCO the pilot/owner may issue a CRS after limited PO maintenanceas specificed in Appendix 1'.* Supported. The poilt/owner is ultimately responsible for airworthiness under MA201. He has also done the work as an authorised P/O maintainer - what further barrier is there to authorising his signature on a CRS.
response	

3.2. Draft EASA Decision — 3.2.1. AMC/GM to Annex VI (Part-ML) to the Continuing Airworthiness Regulation — AMC to Appendix I 'Limited Pilot-owner maintenance' p. 67

comment	*202* comment by: *WESERTRAINER FLIGHT TRAINING* **<u>Separate Scope of Pilot Owner Maintenance tasks for ELA</u>** There should be a separate scope of Pilot Owner Maintenance tasks defined for ELAs. For ELA-Maintenance all tasks other than complex task as defined in Part M Appendix VII should allowed to be performed ands released by the Pilot/Owner. This would be proportionate to the generally low degree of complexity of these aircraft. **The reference to AMC to Appendix VIII should be removed anyway.**
response	

comment	*330* comment by: *WESERTRAINER FLIGHT TRAINING* **<u>AMC to Appendix VIII "Limited Pilot Owner Maintenance"</u>** **EASA should completely remove this AMC including the Tables A,B;C;D.** The listing of the allowed tasks is absolutely inhomogeneous in relation to the complexity of task and therefore nonsensical !

For example "Ignition Spark Plugs – Removal, cleaning, adjustment and reinstallation" is allowed but it's not allowed for the Pilot-Owner to check the pressure of a fire-extinguisher by reading the pressure gauge as part of a scheduled aircraft inspection ???

Suggestion (again):

The pilot owner should be allowed to release all maintenance other than Complex Maintenance Tasks defined in Part M Appendix VII. This would be proportionate to the low degree of complexity and the risk assessment of affected aircraft.

If EASA doesn't want to follow this approach, these tables should be explicitly stated **as examples for the complexity of allowed task**s so other tasks of the same complexity level will also be allowed to be performed by the Pilot-owner.

There is a strong need to express this unambigously in this AMC !

response

comment *357* comment by: *Howard Torode*

Comment from European Gliding Union

Compatibility of Appendix VIII of Part M

We note that Apprndix VIII of Part M forbids a P/O maintanier from carrying out: quote(Task 9): '*tasks as part of the annual or 100hour check contained in the MIP as described in MA302(d).'* This seems to conflict with the principle of PML providing the owner with wider freedom, and not what is now intended. Surely the intention here is to ensure that any tasks that are part of the annual/110 hour schedules should be signed off as part of the overall check by a qualified person?

response

comment *365* comment by: *BBAC British Balloon and Airship Club (UK)*

We comment that the AMC to Appendix VIII to Part M is flawed because of the following inclusion:
"Maintenance tasks shall not be carried out by the Pilot-owner when the task:
9. is part of the annual or 100h check contained in the Minimum Inspection Programme described in M.A.302(i)."

This clause should be deleted.
As written it confuses the performance of maintenance and the release to service of that maintenance.
Please refer to the detailed comments from the AOPA which were discussed with BBAC.

response	

Appendix I:'Vision Statement for Balloon Airworthiness and Maintenance' p. 70-71

comment	*12* comment by: *Ulrich NIGGLI* The conclusions of the European Ballooning Federation are exactly the same for sailplanes. There should be no requirement for individual AMPs for sailplanes and powered sailplanes. Everything needed to perform the maintenance is already written in the maintenance manual of the sailplane and the maintenance instructions of the components.
response	

comment	*84* comment by: *Ian Bridge* My comments refer to private balloons. I believe that balloon safety was well served by the old arrangements. ARCs have only added cost and complexity without any proof of better safety. Balloons are simple aircraft and regulations for other aircraft are often inappropriate and unnecessarily complex when applied to balloons. Balloon manufacturer's Flight and Maintenance Manuals contain all the necessary information. Regular inspections that have been in use for decades are more than adequate to ensure continued safe operation. I think that owners and operators of series balloons should have the option to operate under national regulations if they so choose.
response	

Appendix II: 'A review of experience in General Aviation airworthiness regulation – defeated by complexity' p. 72-75

comment	*636* comment by: *EFLEVA* We concur with much of the sentiment in this document which takes a clear view of the nature of complexity in EASA regulation. We particularly note: 1) the concerns expressed over Part66 personal licensing for engineers, especially those volunteer engineers engaged with EFLEVA member associations. We believe that sporting organisational approvals should permit such organisations to approve their appropriately qualified members as certifying staff, without expensive individual personal approvals. 2) the development by EASA of detailed maintenance programme guidance within Part-ML, which we believe should be the remit of suitably approved associations.
response	

Appendix IV: 'A very simple and light "Part-M" p. 77

comment	*260* comment by: *Klaus Lehmkoester - CAMO, DE.MG.1016, LBA.MG.1016* As written above: Continuing worthiness for a road vehicle needs about 20 minutes! This must be the scale for Light Aircrafts, too! Only to read and understand this page needs more than 20 minutes. Look at an aircraft like on a car. This will be enough!
response	

comment	*453* comment by: *LAMA EUROPE* LAMA EUROPE supports the ideas expressed in Appendix IV by Werner Scholtz, this could be used as very good basis to make really light continuing airworthiness regulation for light aircraft.
response	

comment	*701* comment by: *European Sailplane Manufacturers* The proposed Part-ML is certainly a much improved document against the Part-M as we have it today. Nevertheless by just extracting the simpler rules already introduced for ELA1/2 aircraft and omitting the still needed rules for the maintenance and CAMO organisations you get fewer pages but not a really light Part-M. Therefore this draft of a "one-pager" was created to show how it really could be very simple and light. Hopefully this could be a basis for other proposals of such a really light Part-M and an incentive for authorities and member states to assess where or whether their involvement is really needed in light aviation. We believe that in the end the owner and the persons declaring the aircraft to be in airworthy shape should have the main responsibilities and then the regulation could be indeed very light - just like our proposal.
response	