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Chairman's message

Common sense regulation

Within the current issue of *General Aviation* are two articles that address maintenance matters. The first describes the work and purpose of the newly established AOPA Maintenance Working Group, and the second on the question of how long the seat belts in your aircraft last before they need to be replaced. The discussions of the former and the background gathering of information in the latter have strongly highlighted the burden on the GA maintenance industry of regulation that ultimately serves little or no useful purpose in regard to airworthiness or safety. This is not a new topic, of course, and AOPA has been hammering the drum for 'risk-based' and 'proportionate' regulation for some considerable time. Regulation is taken here in a general sense to cover all requirements that are, or become through regulation, mandatory, but in a particular sense is limited to maintenance and airworthiness aspects.



So what does 'risk-based' really mean? All the factors that have a bearing on the risk, for example, to safety of life or injury of passengers and crew in the case of seat belts, need to be assessed individually and collectively in order to form a judgement as to the effectiveness of a particular regulation or requirement. The resulting regulation should be 'proportionate', in other words, no more demanding than is necessary to address the perceived risk. At the recent British Business and General Aviation Association (BBGA)

Annual Conference, guest speaker Dame Deirdre Hutton CBE, CAA Chairman, pointed out that in regard to regulations "...resources should follow risk...", and that the regulations themselves should be "...efficient and effective...". In highlighting resources she was presumably referring to those of the CAA at its own disposal, but the basic objective is equally applicable to those whom are regulated by the CAA as the agent of EASA.

Thus, it is hugely disquieting that the hard earned - and taxed - resources of some aircraft owners have been squandered on meeting the calendar seat belt life limitation where it applies to particular aircraft and types when the owners themselves, their own maintenance engineers, the seat belt manufacturers, and indeed senior engineers within the CAA, all know that replacing perfectly serviceable seat belts is a nonsense. It's as if common sense flies out of the window. The silver lining in this particular cloud is that those senior engineers referred to are being extremely helpful to AOPA in seeking legitimate ways around this particular problem.

Every extra task, whether administrative or on the shop floor, in the maintenance programme has ultimately to be paid for by the owners, since maintainers, if they are to remain in business, must pass on increased costs. Without doubt, EASA Part M has introduced regulation that is neither more efficient nor especially effective, measured against the regime it replaced here in the UK. Maintenance has always been fairly low down the list of factors that lead to accidents in aviation and so, by definition almost, any change, whether more or less demanding, is unlikely to have a noticeable effect on the risk to safety - but more demanding is clearly less proportionate. Our maintainers and licensed engineers as a collective body hold a huge wealth of knowledge and experience of our sort of aircraft and the current level of regulatory oversight exercised by the CAA surveyors often seems disproportionate and unbalanced, as it concentrates on the bureaucratic aspects. In trying to satisfy the jungle of Part M regulations, inconsistency of approach has crept in, undermining credibility in the process. Somewhere in this system is an example of best practice - why not take this and subject it to a risk audit in order to remove ineffective requirements? Short of sweeping away EASA Part M and replacing it with something more suited to the needs of GA, one of the tasks ahead is therefore to identify areas of disproportionate regulation, and find the appropriate chinks in EASA Part M's armour to draft alleviations or changes of process that are likely to be approved. The AOPA Maintenance Working Group is going to be invaluable here, and the presence and involvement of key people from the CAA is a significant bonus.

The very existence of general aviation depends on the availability of a fleet of aircraft, maintained to appropriate standards of safety, and it is a worthy challenge for AOPA to introduce common sense wherever possible to alleviate burdensome regulation and accompanying costs, thereby keeping GA accessible to all pilots and owners, current and future.

George Done