

# General Aviation

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**Front cover:**  
**B2 Mitchell**  
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## Chairman's message

### Eurocracy gone mad?

The AOPA office receives daily a steady stream of correspondence from members, on a wide variety of subjects of concern including aerodromes, airspace, flight training, licensing, medical, operations and the important aircraft ownership responsibilities of engineering and maintenance.

Queries on the latter have recently shown an increase due to aircraft owner members worrying over the new maintenance regime established by EASA for certificated aeroplanes that is beginning to take effect. Many have a common theme, namely, that the owner's maintenance organisation has introduced an extra charge of £1000 (a typical figure quoted for fixed wing aircraft, with £2000 for helicopters) in order to carry out the work required under the new EASA regulations. The maintenance organisation, in complying with Part M, that part of a EC Regulation on aircraft maintenance, is either a newly established CAMO (Continuing Airworthiness Maintenance Organisation) under 'Subpart G' of Part M or in the throes of becoming one, and the extra charge is for the additional bureaucracy required to carry out an airworthiness review leading to the issue, or recommendation for issue, of an Airworthiness Review Certificate (ARC). It is this part of the maintenance process, not the actual inspection and remedial/repair work carried out on the aeroplane in the hangar, which is new and causing the bureaucratic headache. The ARC has effectively taken over from the old CAA Certificate of Airworthiness, which under EASA is now issued on a life-time basis. The charge from the CAMO ought to be a one-off, as once a database of maintenance and airworthiness matters (e.g. compliance with Airworthiness Directives, Service Bulletins etc.) for each aircraft has been set up, it should not be so costly to update annually thereafter, a view that is supported from within the CAA. It remains to be seen in a couple of year's time whether or not this view is justified.



In the UK, serious accidents resulting from aircraft maintenance lapses are extremely rare in comparison with those from most other causes, and this has led to the now widely held GA industry view that Part M Subpart G is burdening the industry, specifically through this additional bureaucracy, with a significant extra cost that brings with it no tangible improvement in safety. Where we have a difficulty is in not knowing what the safety records of other European countries look like in detail, but we do know that some of them fare extremely badly in comparison with the UK; however, detail is lacking of what proportion of accidents is maintenance based. This allows EASA to point to the "We're doing this for the greater good" argument. IAOPA (Europe) is beginning to get to grips with this and gather information, including the estimated additional cost burden per aeroplane of Part M.

Some flak has been directed at the CAA, wrongly as it happens, because, since the CAA is now a *National Aviation Authority*, it is subservient to EASA, and has been obliged to put into place procedures that comply with the requirements of Part M. A scan of the CAA website relating to ARCs shows just what a huge amount of work this has involved. A system has been set up involving both owner/operators and maintainers that should hopefully operate smoothly into the future, even to the extent of CAMOs being able to download ARCs for aircraft under their 'controlled environment' off the web. The whole exercise has been a huge bureaucratic task.

The recent consultation on Part M, which first saw the light of day back in 2003, resulted in a huge CRD (Comment Response Document) but, such is the back-to-front (as seen by UK eyes) consultation process, it is impossible to make sensible and practical changes subsequently. It is frustrating to be unable effectively to influence the rule-making process, especially as we have become used to over the past ten years or so of productive consultation with our own CAA. This is why it is so important for IAOPA (Europe) to maintain a presence within the appropriate European committee structures, this being one way of influencing future Eurocratic processes. But keep an eye on influence from the USA when the full impact of the proposals with regard to non-European registered aircraft operating in Europe, especially the N-registrations, becomes fully realised; more than anything else, this could cause the biggest jolt to our regulators in EASA than we have yet seen.

*George Done*