

# Taming EASA's Part M monster

EASA Part-M, the Continuing Airworthiness Requirements for aircraft, may have gone down like a dose of salts with the maintainers of commercial air transport aircraft, but it certainly has not been very happily received by the general aviation sector. Part-M has been the topic of several articles and pieces in *General Aviation* over the past few years and was, in large part, a driver for the setting up of the AOPA Maintenance Working Group. This antipathy is not confined to the UK but is Europe-wide. It all came to a head at the EASA Part-M for General Aviation Workshop held in Cologne on 27th October 2011.

There was in fact a requirement to perform a regulatory assessment in Article 24.3 of the basic regulation that originally established EASA, and the workshop represented the first step in the process for the GA sector. In the UK, we are more used to doing things the other way round, having the assessment first in order to make sure the regulations are not inappropriate or over-burdensome. Still, better now than not at all!

The objective of the workshop was to receive feedback from stakeholders and competent authorities on specific implementation issues, and EASA was particularly interested in receiving feedback on twelve itemised topics. Most of these were directed at maintainers, but the first question concerned the format of the rules, and was of interest to owners, maintainers and national authorities alike. AOPA UK requested feedback from members and their maintainers using a standard reply form found on the AOPA website. As well as the twelve questions asked by EASA, we asked some of our own relating to increased costs of maintenance as a result of the establishment of Part M. The majority of replies came from aircraft owners, but most of the detailed content came from the maintainers. The responses were assembled together with those from other country AOPAs (Germany, Iceland, Italy, the Netherlands and Sweden) and presented under an IAOPA Europe banner.

IAOPA was invited to provide a presentation, which was given by Dan Åkerman of AOPA Sweden and George Done of AOPA UK. Dan is a private owner and is currently

professionally engaged in the aircraft maintenance industry on the CAT side, with the additional experience of having run a CAMO. George is a private owner, who once worked in the aircraft industry and over many years has gradually acquired knowledge and experience of GA maintenance. Other invited presentations were from Europe Air Sports (EAS), the European Glider Manufacturers (EGM), the Groupement des Industriels et Professionnels de l'Aviation Générale (GIPAG), and the Swiss Aircraft Maintenance Association (SAMA). Thus, owners, manufacturers and maintainers, both large and small, provided a nice spread of presented responses. These offerings were sandwiched by two from EASA, the opener being a 'Summary of feedback received from NAAs and Stakeholders' by Juan Anton, Continuing Airworthiness Manager, with the conclusions presented by Eric Sivel, Deputy Rulemaking Director.

Thus, the event was really more of a conference than a true workshop in that the timetable included only presentations with some time devoted to questions and discussion. For those who are interested in the detail, all the presentations, including that from IAOPA, can be found on the

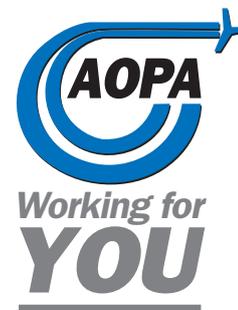
EASA website – just look for Part-M GA Workshop and then 'Presentations'. There were almost 180 attendees, 44 from 24 NAAs, 118 from industry, of which almost half represented associations, the rest coming mainly from maintenance organisations. Airships, balloons, gliders and helicopters were represented in addition to powered fixed wing aircraft, and the EASA team comprised 14, all of whom, apart from Messrs Anton and Sivel, occupied the very back row of the lecture room, well out of the line of fire!

It is worth looking at the presentations even if the detail on maintenance aspects is too unfamiliar, simply because of the strength of feeling expressed. Here is a selection of observations from the slides and discussion:

- The format of Part-M is too complicated for GA, not easy to understand and open to wide interpretation;
- What seems to be missing over the last few years is a "change management programme";
- Safety is affected by increased costs resulting in a reduction of flying hours, risks induced by concentration of paperwork and procedures, every extra interface in the process bears the potential of a failure;
- Part-M did not solve any problem – it became one;
- Standardisation (the chief objective of Part-M) is not working across the different country NAAs.

On the last point, it seems that most of the NAA's maintenance programmes have been subject to audit by standardisation teams from EASA, but there is still a huge variation between the different NAAs, which is down to interpretation mainly, but also to language translation in some cases. A graphic illustration of gross lack of standardisation was provided by one of the GIPAG slides, see the figure above.

There was a fear that the initial presentation of a summary of the feedback received from stakeholders and NAAs by Juan Anton



would be superficial, but in fact it was anything but – indeed, it was extremely comprehensive with 62 slides, representing almost 40 per cent of the total presented at the workshop. This was an encouraging start and it was gratifying to see many of the points made by IAOPA appearing in this summary.

So what next? The concluding presentation from Eric Sivel

summarised the actions. It is proposed to create a taskforce from the stakeholders to address several issues including a general simplification of Part-M and for GA in particular. The taskforce would start its work before the end of the year and have an action plan by June 2012. Additionally, there were several items for immediate attention where both high costs and no real safety benefit have been identified, again with work starting before the end of the year and looking for “quick fixes”, and with a fast track process being agreed by

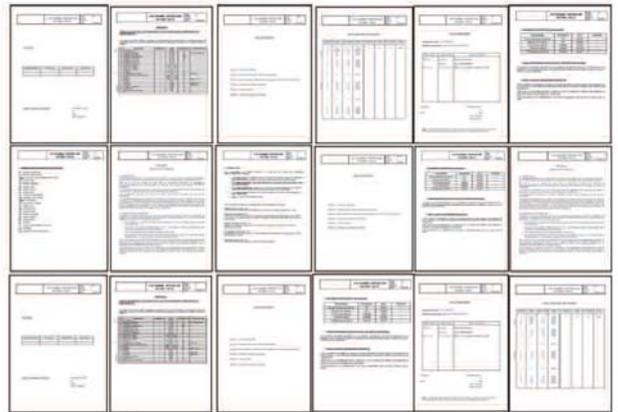


## Generic Maintenance Programmes and indirect approval procedures First issue : standardisation

1 A MP in one EU country



2 A MP in another EU country



**Above: approved maintenance programmes in two different countries – one page in one country, 18 in another. Courtesy GIPAG**

## Chief executive's diary:

### It's not just me...

Often when I meet members (and non-members, too) they tell how much they enjoy reading my diary. Believe me, I'm grateful to all of you who do take the time and trouble to read it and I'm even more grateful for the thanks I receive. But I can only do the work because of the support of the AOPA staff and volunteers. There's a section in these pages on our Executive Committee meeting in November, and there you'll see the names of George Done, David Ogilvy, Pam Campbell, Chris Royle, Mick Elborn, Charles Henry, Pauline Vahey and John Walker. There are many more, on the Instructor Committee, the Members Working Group, the Maintenance Working Group, and as individuals doing ad hoc jobs on behalf of their fellow pilots. Mandy, Lynne, Pam and Neil adroitly keep the office ticking over, so I don't have to worry about that. Please keep doing what you do, because without you – and you all know who you are – my job would be infinitely more difficult. AOPA is far more than a one-man band, although it sometimes looks that way because I do most of the reporting to you through the magazine. The band members may change, and some may play louder than others, but the show keeps rolling along thanks to the hard work and sacrifice of many men and women, and I can never thank them enough.

I left off my last diary just as I was heading off to the States for the AOPA Summit; there's a short article about it in these pages, so suffice it to say it was a good networking opportunity and I had some useful meetings with AOPA President Craig Fuller. Transatlantic co-operation has never been

more important than now.

I went to Poland at the end of September to meet with prominent Polish aviation figures in company with Blazej Krupa of AOPA Poland. Blazej is great company, and as a former rally champion he drives his car with great élan. We had the IAOPA Europe quarterly Regional Meeting in Warsaw, and there's a short report in these pages; it was an opportunity for myself and Dr Michael Erb of AOPA Germany to report to all on the AOPA summit.

On October 5th I presented the 'Robinson Roadshow' to the Alouette Flying Club at Biggin Hill, and it went well; we had about 40 in, and several commented positively on the work we do. Spread the word – more members means more subscriptions means more work and more influence. I repeated the performance on the 10th at Duxford for the Flying Farmers, who were having their AGM. They're great supporters of AOPA, for which I am grateful.

On the 12th I sat in on a CAA interview with a member who has a problem. I can't say much because it's *sub judice*, but I would issue a reminder to everybody that keeping tech logs and other paperwork up to date is an absolute requirement, no matter what other pressures there are. If, for instance, you failed to squawk an aircraft that deserved it, you are effectively contravening Article 2.3.1(4)(a) of the ANO, specifically the bit that says that a person “must not knowingly make... any false entry... or any material omission from any log book or record...”



Saying you feared for your job might not butter any parsnips with the CAA. Maybe I can tell the full story one day.

The following week I went to a meeting of the National Air Traffic Advisory Committee, NATMAC. Let me take this opportunity to express my appreciation to the staff of the CAA's Directorate of Airspace Policy as they wrestle with many difficult issues and try to balance the needs of all airspace users. At times it may seem like we don't appreciate the work that goes on, but we do, and we thank DAP for being receptive to our concerns. The key focus of the last meeting was Future Airspace Strategy (FAS) which looks at how we in the UK will implement the provisions of Single European Sky and SESAR. It's important for AOPA to be represented on both the British and European sides of the street, so to speak. In the UK we'll benefit from FASIIG, the industry implementation group, which is a partnership between the regulator and the regulated. Other countries should be so lucky. The two key issues are safety and the environment. As traffic grows, safety must be improved to match, and at the same time there's an absolute requirement to reduce CO2 emissions. The Anglo-Irish Functional Airspace Block (FAB), recently established, will save 50,000 tonnes over five years, according to NATS. This is important for CAT because their growth is constrained by CO2 limits, which must not be greater than those of the year 2000.

Another issue is that of spectrum, which the government wants released for mobile communications. Neither satellite nor radar frequencies have any protection! Andy Knill, Head of Spectrum and Surveillance at DAP, is doing some very important work on this subject and we will support his efforts

the taskforce. When asked to explain what this meant, M Sivel seemed to imply some bypassing of the NPA and CRD exercises. Also for immediate action were the simplification of maintenance programme approvals and the launch of generic maintenance programmes (GMPs). It is interesting that our own UK CAA is already well on the way to replacing the current LAMP (Light Aircraft Maintenance Programme) by a GMP. If it all works out, the level of complexity will end up being similar to what it was before the introduction of Part-M, a situation that will please maintainers and owners alike. Maintainers should be able to avoid or discard paperwork that contributes nothing to airworthiness or the safety of flight, and owners, once the maintainers have covered their initial set-up costs for the current Part-M, will find themselves paying less for their maintenance. IAOPA's job is to now ensure that EASA delivers on the promises made at this workshop. ■

# Hands across the ocean

IAOPA is mounting a Transatlantic campaign to bring American and European regulators together to agree a formula for accepting each other's licensing systems. The aviation industry is suffering because of uncertainty over future licensing procedures, and those who make the rules must agree urgently on what the rules are.

EASA has stuck a spoke in the wheel by insisting that all pilots domiciled in Europe must in future have European licenses and ratings, which strikes at the heart of a system under which large numbers of aircraft have operated in Europe on the N-register with their pilots licensed by the FAA. The main reason for this has been the inability of European pilots to obtain instrument ratings – something EASA is addressing – but other imperatives include

maintenance schemes, airworthiness directives that apply in some jurisdictions and not in others and so forth.

While EASA's attack on the N-register is entirely chauvinistic – it recognises that there are no safety issues involved – it accepts that the cost and difficulty of being required to have duplicate qualifications from two different authorities is as undesirable as it is unnecessary, and has suggested that it may be possible to agree a formula for mutual acceptance of licences, and to add it as an annex to a Bilateral Agreement on safety signed between Europe and America earlier this year. Unfortunately neither side seems keen to get on with the business, so at October's AOPA Summit in Hartford, Connecticut, AOPA UK's Martin Robinson and AOPA-Germany's Dr Michael Erb met

wherever possible. It beggars belief that the government wants to sell off more spectrum at a time when aviation is moving from terrestrial-based to a space-based navigation system, but they smell new jobs and more taxes overpowers everything. The USA has a similar problem with Lightsquared, the 4G operator, which wants to use spectrum adjacent to that of VHF radio, radar and GPS for new services of its own. Some say filtering will allow peaceful co-existence, but the FAA is not so sure. GNSS services are not protected by the World Radio Conference, which could put a spoke in the wheel of SESAR and NexGen, its American equivalent.

On October 21st I had a meeting with representatives from Honeywell who are looking to establish closer links with AOPA across a range of activities. We look forward to building stronger links that ultimately benefit our members. On the 24th CAA Chief Executive Andrew Haines visited the AOPA offices for an open discussion on GA issues, including the IMCR. We also joined by another CAA executive in the person of Jim McKenna, who is well known to GA. Jim is working on a paper looking at how in the future the CAA may adopt a lighter touch to regulating recreational aviation. More to follow on that...

Later that evening we had a Members Working Group discussion in the office on AOPA corporate governance. Some people believe that our governance is restricting growth in membership, others disagree; if you have a view please email me, martin@aopa.co.uk, or give me a call on 0207 834 5631.

I travelled to Brussels on October 26th for a series of meetings. First I met the new external relationship manager in Eurocontrol Mr Rob Peters, who is ex-Dutch military. I'm pleased to see that Eurocontrol is thinking

again about GA as we disappeared off their radar for a while. The main purpose of the trip was to attend the first meeting of the newly formed Agency Advisory Body, a high-level group chaired by Phil Roberts, the number two in DAP. Phil has just done his IMC rating, I understand, but more importantly he received an OBE for his work. Congratulations, Phil! The AAB will get input from various working groups, but as we don't have the resources to take part in all of them, the AAB will give us an opportunity to raise issues.

On October 28th I attended a meeting at the CAA in Gatwick, looking at the input of GA safety matters into the State safety plan. This was co-ordinated through Roger Hopkinson as chairman of the GASF and Hazel Courtney of CAA, who is also a GA pilot. This group is likely to dovetail into the work of Jim McKenna, who was also in attendance. What we expect is a more risk-based approach to regulating GA in the UK. This should then lead to less direct oversight of GA, and hopefully reduce CAA charges, which links directly with the Prime Minister's calls to reduce the regulatory burdens on small businesses.

Next day I attended the *Flyer* professional flight training show at Heathrow. (I write a monthly column for *Flyer*, in case you haven't seen it – get your copy now). If anyone thought that interest in aviation was in decline, this event bucks the trend. The seminar halls were full, as were the stands. In chatting to Ian Seager about what else could be done, we thought that maybe there should be some push towards professional flying which is not airline-orientated. AOPA may have a presence next year – if you'd like to volunteer to help man a stand, please let the office know.

On the 31st I attended the Aerodrome Operators Association annual dinner and

awards. Each year the AOA asks AOPA to hand out the 'best GA aerodrome' award, and this year it went to Sywell. Congratulations – you have a fantastic aerodrome there. The runners-up were Denham (last year's winners) and Blackbushe.

On November 2nd the DfT had a Single European Sky briefing on SESAR and AOPA, together with the military, was invited to give a briefing on where we think we are inside the SESAR programme. Ben Stanley, the IAOPA co-ordinator gave a presentation which was very well received. Ben approached the subject by addressing the risks that SESAR poses to GA as well as the risk GA poses to SESAR. More to follow on this...

Three days later I went up to Elstree to talk to some worried local pilots following the problems at Cabair. It's good to see that a couple of flight training operations have been set up to plug the gap and that Elstree is alive and kicking – and that there are people who are willing to invest in GA. On November 7th we had the AOPA Executive Committee – see coverage elsewhere in these pages – and on the 8th I attended a meeting in the European Parliament discussing the Transport White Paper. The speakers included Jackie Foster, Brian Simpson and Andrew Haines. The discussion centred on multimodal transport issues and how 'TEN-T funding' might be used to provide real benefits for GA. I don't have the space to get into what TEN-T funding is here, but remember the term because I think you'll be hearing it more often in future. The other interesting fact I picked up was that there's a plan to remove all fossil fuel use in city centres by 2050!

Merry Christmas to all!

**Martin Robinson**

with Craig Fuller, President and CEO of AOPA US, to plan a strategy for forcing the issue.

AOPA US has enormous lobbying power and influence that European AOPAs can only envy, and it will be of great benefit to European general aviation, which risks

being dragged down by the new regulatory landscape, to have AOPA US impressing upon the FAA the need to address these issues as a matter of urgency.

There are many pitfalls, however. Both sides must work to ensure that any demands EASA makes

for changes or additional training are solely safety-related. There are hidden dangers in



any *de facto* acceptance by the FAA that its training systems are deficient; the Administration must not be placed in a position where it either has to change its national training system or risk liability action in case of accident. IAOPA will be working with the General Aviation Manufacturers Association to get this issue settled, but it's not going to be easy, or quick.

European members attending the AOPA Summit included Lennart Persson of AOPA Sweden, an engineer who was focusing on technical systems which might be of use in Europe under SESAR. There are, however, fundamental differences of approach between America and Europe. Driven by

industry demand, the iPad is becoming ubiquitous in American cockpits, and the FAA has provided a DME frequency which can be used to upload data. Martin Robinson says: "In the US, the industry identified the requirement and instituted the innovation, and the regulator responded. In Europe, we have regulators who produce a requirement for what we must install, often with little understanding and the most rudimentary consultation, and they take so long over it that often it's obsolete by the time we get it. There's no need to ask why general aviation is twenty times more valuable in America than it is in Europe." ■

# Descent into danger

IAOPA-Europe has joined with AOPA-US to try to turn back a proposed EASA rule which would force pilots to descend into cloud in mountainous terrain if they were not carrying oxygen. EASA has published proposals requiring pilots flying between 10,000 and 13,000 feet to descend below 10,000 feet after 30 minutes. IAOPA believes that this rule would introduce a serious safety hazard in order to address a safety problem which doesn't exist, and data from AOPA-US proves the point.

The rule is contained in EASA's Notice of Proposed Amendment on Non-Commercial Operations, to which IAOPA has responded with a sheaf of requests for amelioration, exemption or wording changes. The most urgent is this oxygen requirement, which IAOPA says should be changed from an absolute rule to guidance for pilots. In its response on behalf of IAOPA, Jacob Pedersen of AOPA-Denmark says: 'IAOPA Europe has with assistance from AOPA US studied all accidents in the period 1991-2010 where the NTSB has listed hypoxia as a contributing factor. Of all these accidents none involve flights in the 10-13,000 ft window. All reported accidents relate to aircraft operated above 14,000 ft. Looking at US data is particularly interesting since the FAA does not mandate supplementary oxygen for operations below 12,500 ft. As evidenced by the accident statistics this has not caused accidents for the cruising altitudes where EASA is now proposing to

mandate oxygen.' Figures for Germany, where oxygen is not mandated below FL120, are similar.

IAOPA is also seeking changes to EASA's non-commercial operations proposals because the rules have been written for airlines and should not apply to GA. For example, it is seeking more flexibility in regulations on the carriage of dangerous goods, which would make it impossible to carry a can of de-icing fluid, a camping gas cylinder or a spare oxygen bottle on board without

special permission, while allowing the carriage of perfume for on-board sale. IAOPA also makes the point that expecting every GA pilot to read and understand the 1,000-page ICAO manual on dangerous goods, 99 percent of which is irrelevant to GA, is unreasonable.

IAOPA wants a rethink of EASA's proposal to remove a traditional dispensation for aerobatic aircraft not to have to carry fire extinguishers; an extinguisher that breaks loose during violent aerobatics is a significant hazard. Among other requested changes, IAOPA



proposes that persons taxiing aircraft should not have to be qualified to use RT at airfields with no radio; use of aeronautical charts should

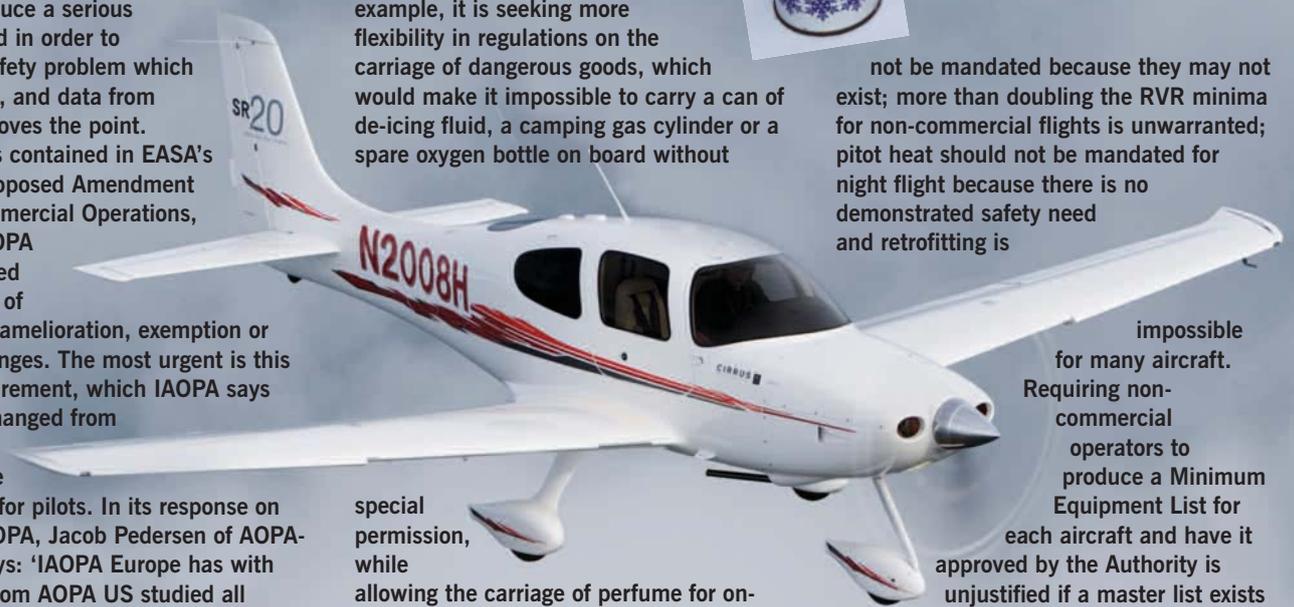
While carrying perfume for sale, a GA aircraft may be prevented from carrying de-icing fluid

not be mandated because they may not exist; more than doubling the RVR minima for non-commercial flights is unwarranted; pitot heat should not be mandated for night flight because there is no demonstrated safety need and retrofitting is

impossible for many aircraft. Requiring non-commercial operators to produce a Minimum Equipment List for each aircraft and have it approved by the Authority is unjustified if a master list exists for the type; and pilots should be allowed to use publicly-approved airports without separately having to satisfy themselves that they conform to every regulation.

On the positive side, EASA has abandoned the proposal to require all aircraft to carry fixed ELTs and will allow Personal Locator Beacons in their place.

The full IAOPA response is carried on the IAOPA-Europe website [www.iaopa.eu](http://www.iaopa.eu)



# Think you've got problems?

IAOPA Europe held its quarterly Regional Meeting in Krakow, Poland, on October 1st with 35 delegates present from 23 countries. An encouraging facet of the Meeting was the presence for the first time of representatives of AOPA in Iceland, Norway and Ukraine. Iceland sent Valur Stefansson, Norway sent Jorn Vidar Lillestrand, and Gennadi Khazan came from Ukraine. Several delegates gave reports of particular problems, and of some successes, in their own countries.

AOPA Lebanon reported that following a series of meetings with senior figures in the Lebanese government and CAA in which Martin Robinson was involved as IAOPA Senior Vice President, it had been agreed that AOPA Lebanon would be involved in regular meetings with officials on subjects that affect GA. This is something of a breakthrough in relations between GA and the regulators and comes at an important time, as Lebanon has decided not to adopt EASA regulation but to formulate its own rules. AOPA Lebanon will be an integral part of the process when those regulations are discussed.

One of the main problems for AOPA Norway is lack of access to airports. Jorn Vidar Lillestrand reported that while the government had promised to allocate resources to improving airport infrastructure, there was as yet no sign of the money.

For AOPA Ukraine, Gennadi Khazan spoke of the huge strides that had been made in recent times, and of the long road they still had to travel. There are only 181 general aviation aircraft in the whole of Ukraine, but three years ago there were none. Avgas cannot be found – in fact, it is illegal – and all aircraft run on mogas. For general aviation there is no IFR, and no flight at night. Foreign aircraft can fly only on airways.

Gennadi's words were translated by

AOPA Russia's Vladimir Turin. Martin Robinson says: "Having a Russian translating the words of a Ukrainian into English for an audience of 35 delegates from different countries who have nothing in common but a passion for aviation illustrates what IAOPA is all about."

Before the meeting, Martin Robinson and AOPA Poland's Blazej Krupa held a series of useful meetings with senior officials of the Polish CAA, Poland's air navigation service provider PANSa, Polish general aviation magazines and the Polish Aero Club, a quasi-official body with which AOPA Poland enjoys a close co-operative relationship.

Poland is still going through a post-Soviet modernisation which calls for fundamental changes of attitude as well as of regulations, but all sides recognise the problems and the regulators are striving to be as unobstructive as possible while fulfilling their safety remit. Martin Robinson reports that in every case, officials were open and constructive, and they acknowledged that while there were still some Soviet-era hangovers in the system, they were steadily being eliminated.

Martin and Blazej Krupa were able to meet with the Deputy Director of the Polish CAA, Mr Tomasz Kadziolka, a general aviation pilot with a share in a light single. Subjects under discussion included the implementation of EASA-FCL, which will be less painful in Poland because every pilot already has a JAR PPL, and will simply be issued with an EASA equivalent when renewal time comes around. Costs will be kept to a minimum, partly because aviation in Poland is not required to pay for the entire cost of its regulation, as in the UK and in some other countries – the Polish Interior Ministry sets the fees, which tend to be proportionate and reasonable. Following

this meeting, AOPA Poland is to be integrated into a domestic consultation system, with an inaugural meeting scheduled for next month.

Martin and Blazej went on to a meeting with Mr Marcin Prusaczyk, Vice President of the Polish Aero Club, a long-established and highly-respected organisation with which AOPA Poland shares resources. It issues certificates which confer privileges which are recognised by the Polish CAA. One of these certificates is remarkably similar to the UK's IMC rating, and teaches VFR pilots to maintain control of an aircraft in IMC and return it safely to the ground using whatever instrument approach as available. Privileges of the Polish Aero Club's 'IMC rating' are restricted to Poland; how will it play under EASA?

Later Blazej and Martin met with Mr Krzysztof Banaszek, President of the air navigation service provider PANSa, and received the good news that on January 10th next year Poland is to abandon the practice of passing altitudes in metres and will thereafter use feet. The meeting discussed AOPA Poland's concerns over the excessive size of some CTRs, and Mr Banaszek confirmed that PANSa is addressing the issue by moving some VORs to create different approaches. Also discussed were problems with military airspace – the Polish air force blocks out hundreds of square kilometres of airspace from which GA is excluded, despite the fact that there is little or no military flying activity in it; attitudes seem slower to change in the military than in the civilian world.

Martin said afterwards: "I was impressed by the fact that PANSa and the Polish CAA are thinking the way modern regulators think, and that they are very candid about the problems they must overcome. We all share the same goals – to maintain the highest levels of safety while promoting growth – and in some ways Poland is a good regulatory example for some other countries to follow." ■

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