



Better regulation for general aviation

Y Morier -EASA Rulemaking



Table of contents

- The advance NPA 14-2006
- Part-M
- Aircraft mechanics licensing
- Pilot Licensing
- Operations
- Schedule for extension of scope for operations and licensing
- Part-21:
 - ★ **NPA 2008-07**
 - ★ **CRD 2008-07**
 - ★ **Part-21 and Part-M Opinions**
- Permit to fly for LSA
- Task BR.010
- The study
- Summary and conclusions
- Attachment:
 - ★ **general thrust of replies to comments on NPA 2008-07**



The Advance-NPA 14/2006

➤ The Advance-NPA 14/2006

- ★ **Envisaged a concept for better regulation for general aviation:**

http://www.easa.europa.eu/ws_prod/r/r_archives.php

- ★ **The comment response document CRD-14-2006 was published on 9 November 2007:**

http://www.easa.europa.eu/ws_prod/r/r_archives.php



The Advance-NPA 14/2006: rationale (I)

- *"...it can be concluded that in view of:*
 - ★ *The stagnating, difficult economic prospects of General Aviation in Europe, in comparison with other regions of the world, particularly, North America;*
 - ★ *The apparent growth of certain segments of General Aviation, particularly those that are not subject to the full set and machinery of the traditional civil aviation regulatory regimes;*
 - ★ *The nature and extent of the safety risks, and particularly the absence of risks to non-involved third parties, in this sector of civil aviation;*
 - ★ *The desire amongst most of the stakeholders to ensure the continued existence, and hopefully growth, of this sector of aviation;*
 - ★ *The recognition that General Aviation forms an important part of the lives of many*



The Advance-NPA 14/2006: Rationale (II)

- ★ *The recognition that General Aviation forms an important part of the lives of many European citizens and that their participation and enjoyment of this activity should not be prejudiced by unnecessary complex regulation;*
- ★ *The recognition that General Aviation plays an important role in the European economy, particularly due to its innovative technical design capabilities; and*
- ★ *The general drive in the European Community to reduce the burden of regulation, and to only create regulation where there is a proven case that regulation is necessary, and, when this is established, that such regulations are proportional, easily understood and practical;*
- *it is necessary to review the legislation affecting this sector of civil aviation and to adopt a new approach more conducive to its harmonious development.*



Part-M

➤ Continuing airworthiness

- ★ **NPA 2007-08 envisaged many simplifications to Part-M including pilot owner maintenance:**

http://www.easa.europa.eu/ws_prod/r/r_archives.php

- ★ **Comment response document 2007-08 was published on 06 March 2008 and was open for reaction until 06 May 2008:**

http://www.easa.europa.eu/ws_prod/r/r_crd.php

- ★ **Opinion 02/2008 published 16 May 2008:**

http://www.easa.europa.eu/ws_prod/g/rg_opinions_main.php

- ★ **Regulations 1056 and 1057/ 2008 published on 28 October:**

Specific alleviations for ELA1 and LSA



NPA 2008-03 : Aircraft mechanics licensing

➤ Aircraft mechanics licensing

- ★ **NPA 2008-03 Licences for non-complex aircraft maintenance engineers was published on 28 March 2008 and was open for comment until 28 June 2008:**

http://www.easa.europa.eu/ws_prod/r/r_npa.php

- ★ **CRD published on 17.09.2009**

- ★ **Opinion adopted December 2009:**

http://www.easa.europa.eu/ws_prod/g/rg_opinions_main.php#2009



NPA 2008-03 : Aircraft mechanics licensing

➤ Aircraft mechanics licensing

- ★ **"B3": applicable to sailplanes, powered sailplanes and non-pressurised piston engine aeroplanes of 2000 Kg MTOM and below (not applicable to balloons, airships and helicopters)**

Includes limitations (can be removed based on experience)

- ★ **"L": applicable to sailplanes, powered sailplanes, aeroplanes of 1000 Kg MTOM and below, balloons, hot-air airships and MOST gas airships (not applicable to helicopters and some gas airships).**

Includes ratings and limitations (can be removed based on experience)

"Limited-L": licence limited to maintenance not including annual inspections and major repairs and modifications.

"Full-L": includes the privileges of "Limited-L" plus annual inspections and major repairs and modifications.



NPA 2008-17: Pilot Licensing

- NPA for Part FCL and Part Medical was published on 05.06.2008 (NPA 2008-17)
- Comment period was extended several times but closed 28.02.2009
- All the 8100 comments on Part FCL were reviewed and some of the input incorporated
- Comment Response Document (CRD) containing also the amended text of Part FCL to be expected for April 2010
- The documents (NPA and CRD) can be found at:
 - ✦ <http://hub.easa.europa.eu/crt/>



NPA 2008-17: Pilot Licensing

- In addition to the PPL (Private Pilot Licence):
 - ★ **Creation of a new Leisure Pilot Licence (LPL) for aeroplanes, helicopters, sailplanes & balloons**
 - Basic LPL for aeroplanes and an additional instructor category
- Main advantages of this new Leisure Pilot Licence for General Aviation?
 - ★ **Lighter than JAR FCL and easy accessible**
 - ★ **Unlimited validity but recency requirements**
 - ★ **Sub-ICAO medical (GMP instead of AME (aero-medical examiner))**
 - General Medical Practitioner (GMP): to simplify a practising doctor with aviation experience
 - ★ **Additional Ratings (e.g. aerobatics / towing / mountain)**
 - ★ **European-wide licence**



NPA 2009-02: Operations

➤ Operations:

- ★ **NPA 2009-02 published on 30.01.2009:**
- ★ **Part OPS GEN: General operating and flight rules**
 - Subpart A: General requirements
 - Subpart B: Operational procedures
 - Subpart C: Aircraft performance and operating limitations
 - Subpart D: Instruments, data and equipment
 - Subpart E: Manuals, logs and records
 - Subpart F: Security
- ★ **Review of comments should be finished by 08/2010**
- ★ **CRD will be published on the EASA website.**



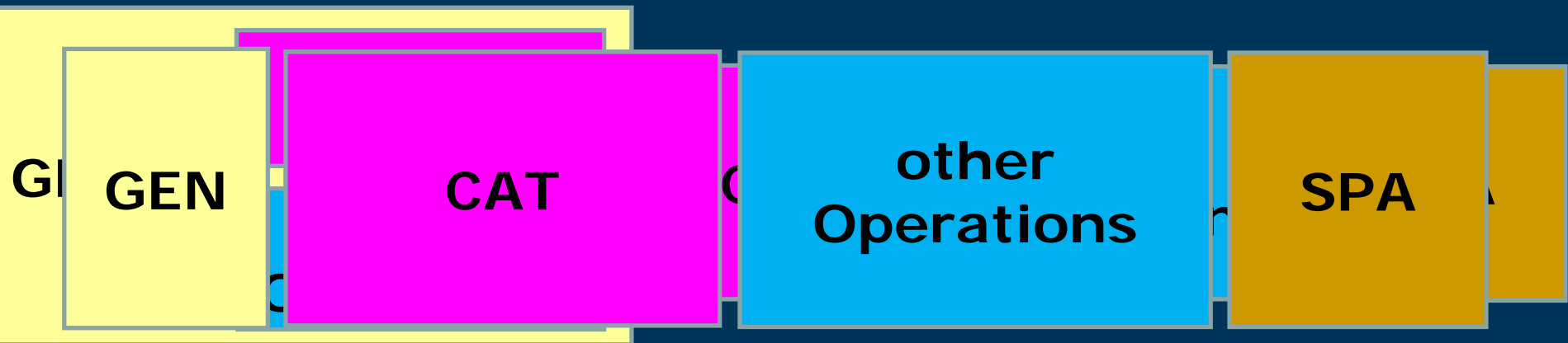
Simplification for Part OPS - GA

- Total system approach and **horizontal structure** of authority and organisation requirements **maintained**
- **Sub-structure** of Part-OPS to be adapted
- It was decided to create a specific subpart for **non-commercial activities** with **non-complex aircraft**



Simplification: Regulations Structure

Technical Requirements OPS



[exit](#)



Extension of scope to operations and licensing

1. FCL

**Published 5/06/2008 - Comment period closed on 28/02/2009:
More than 11.000 comments**

2. Authority and Organisation Requirements

Published 31/10/2008 - Comment period closed on 28/05/2009

3. OSC

**Published 16/01/2009 - Comment period closed on 30/06/2009:
880 comments received**

4. OPS

**Published 30/01/2009 - Comment period closed on 31/07/2009:
14000 comments received**

5. 3rd country operators

To be published later

**Further Planning (publication of CRD and opinions) has been reviewed.
Opinions to be delivered between August 2010 and 1st quarter 2011**



EASA website - buttons

EN Management Board Procurement Contacts & FAQ Regulations Structure
ES Budget and accounts SAFA
ET
FI
FR
HU
IS
IT
LT
LV
MT
NL
NO
PL
PT
RO
SK
SL
SV

European Aviation Safety Agency (EASA)

The European Aviation Safety Agency is the centrepiece of the European Union's strategy for aviation safety. Our mission is to promote the highest common standards of safety and environmental protection in civil aviation.

A common strategy
Air transport is one of the safest forms of travel. As air traffic continues to grow a common initiative is needed at the European level to keep air transport safe and sustainable. The Agency develops common safety and **environmental rules** at the European level. It monitors the implementation of standards through inspections in the Member States and provides the necessary technical expertise, training and research. The Agency works hand in hand with the **national authorities** which continue to carry out many operational tasks, such as certification of individual aircraft or licensing of pilots. ([read more..](#))

EASA concerned about KOITO aircraft seats

General Publications
Technical Publications

Flying with small children click here

Airworthiness Directives **AD**

Comment Response Tool **CRT**

Flight Standards

ATM and Airports

Search

Advanced Search
Sitemap
Search Tips

Shortcuts

- Home Page
- The Agency
- Organisation Structure
- Executive Director
- Management Board
- Communications
- Events
- Recruitment
- Quality Management
- Contacts
- Contacting EASA
- Map
- FAQ
- Generic FAQ
- Rulemaking FAQ
- Fees and Charges FAQ

Latest news

- 10/02/2010 The fourth issue of EASA News has been published. Click [here](#) to view it.
- 08/02/2010 **Part-66 Workshop** on consolidated opinions now open for registration. For more information click [here](#).
- 08/01/2010 **New!** Revised ETSO FAQs [section](#).
- 18/12/2009 The Agency has published Amendment 5 to General Acceptable Means of Compliance for Airworthiness of Products, Parts and Appliances («AMC-20»). The related documents are available under Certification Specifications page.

http://easa.europa.eu/flightstandards

start 2 Microsoft Office... EUParl.pdf - Adobe ... General Aviation ge... Microsoft PowerPol... 4 Internet Explorer DE 10:19



Flight Standards Website

- This is a specific EASA website created to keep stakeholders informed about some of the actual rulemaking activities
- The following issues are covered:
 - NPAs FCL / OPS / AR-OR / TCO
 - Events and latest news
 - Structure of the Rules
 - Instrument Flying
 - General Aviation
 - Frequently asked questions



Rulemaking Handbook

- In order to assist stakeholders to identify the rules applicable to their specific activities a tool was developed
- Rulemaking Handbook or “E-tool”
- A new version of the tool will include Part M and later on other requirements as well
- Final version of this tool will be launched spring 2010



Part-21: NPA 2008-07

➤ Objective:

- ★ The intention is to create a lighter regulatory regime based around a new process for the European Light Aircraft (ELA).



Part-21: NPA 2008-07

➤ Overview:

- ★ ELA is not a new category of aircraft defined by criteria such as stalling speed or certification code, but is a substantially simpler new process for the regulation of aircraft and related products, parts and appliances.
- ★ The intention is to issue type certificates for the type and certificates of airworthiness for the individual aircraft.
- ★ The ELA is sub-divided into two sub-processes: ELA 1 (E.g. aeroplanes below 1000kg) and ELA 2 (E.g. aeroplanes below 2000kg)
- ★ For ELA, define parts that don't need a form 1
- ★ Create a concept of standard changes and repairs
- ★ Create a CS-LSA Light Sport Aeroplanes (Aeroplanes below 600/ 650 kg)



Part-21: CRD 2008-07

- More than 800 comments received
- The Comment response Document is being drafted and should be published April 2010 in two steps:
 - ★ **First publication will be a detailed Explanatory note.**
 - ★ **Second publication: full CRD with proposed text changes.**



Part-21: CRD 2008-07

➤ Comments:

- ✦ **General comment: "not what we wanted"**
- ✦ *Type certificates and restricted type certificates*
- ✦ *Criteria for ELA 1 and 2*
- ✦ *Demonstration of capability for design*
- ✦ *Demonstration of capability for production*
- ✦ *Combined POA/DOA*
- ✦ *Qualified entities*
- ✦ *Parts that don't need a form 1*
- ✦ *Reference to ASTM standards in CS-LSA*
- ✦ *Standard changes and repairs*
- ✦ *Harmonisation with FAA*
- **Attachment 1 provide the general thrust of the replies but this may still evolve therefore:**
 - ✦ **Please refer to the Explanatory note/ CRD when published**



Import/export discussions with FAA (I)

➤ Harmonisation with FAA:

★ Key issue because of the two different systems for Light Sport Aeroplanes (LSA):

EASA and China: 'Top-down';

FAA and other countries: "out of the box"

LSA are designed and produced in many countries and
international cooperation exist



Import/export discussions with FAA (II)

➤ Harmonisation with FAA:

- ★ **Management agreed at the March 2009 CMRT (Certification, maintenance, rulemaking team) to a specific effort to allow smooth import-export:**

List of 19 specific issues established and discussed at a teleconference on September 23 and on October 21.

Most do not result in actions except 5: manufacturing (oversight, fees and charges); used aircraft; link with Primary category; Parts without a form One, State of design issue for non-EU

Report at CMRT end 27-29 October: 3 focal points nominated



Part-21: CRD 2008-07

➤ General conclusion

★ *Opinion for Part-21:*

Modified compared to the NPA (See attachment 1)

★ *Opinion to Part-M:*

Reflect the proposed changes to the ELA1/ ELA2 criteria

★ *A new task proposing modification to the basic regulation:*

➔ *To be started in 2nd quarter 2010 and should finish in 1st quarter 2013*

➔ *Special effort to prepare the task*

➔ *Will be supported by a study launched in 2009*



Part-21 and Part-M Opinions

- Should be published 2 quarter 2010:
 - ★ Will allow to review the reactions in depth and further discussion with FAA on import export on LSA
- Adoption of the Amendment to Part-21 by the Commission using the Comitology process with scrutiny:
 - ★ 9 Months after the Opinion.
- Note: CS-LSA can be published as soon as the opinion is published.



Permit to fly for LSA

- Short term temporary solution for airworthiness using Part 21A. 701 (15)
- Limitation to non-commercial activities
- Main issue: conformity issue and therefore need for a Part-21 sub-part F approval
- Still under discussions with NAA:
 - ★ Need for further review and for a procedure



Task BR.010

- 1. Propose the necessary modifications to the basic regulation and EASA implementing rules to achieve an adapted level of regulation for ELA1 for airworthiness, maintenance, operations and licensing.**
- 2. Harmonise the above with other authorities**
- 3. Improve the approach to orphan aircraft**
- 4. review the essential requirements for airworthiness to avoid any unwanted effects on the small aircraft**
- 5. Propose that a Type Certificate for engine and propellers is not needed for some ELA aircraft.**
- 6. Ensure that self-sustained powered sailplanes equipped with a turbojet are non-complex aircraft**



The study

- The study will review a sample of existing micro-light regulations, evaluate them in consultation with stakeholders and issue recommendations in relation with point 1 of task BR.010.
- The purpose is comply with the recital 5 of the basic regulation and to provide ideas for point 1 of the task BR-010.
- Schedule: Call for tender published October 2009
- Contract: January 2010
- Duration: 11 months



Summary/ Conclusions (I)

- Overview of the outputs of the A-NPA 14-2006:
 - ★ Continuing airworthiness, Operations, Licences
- Detailed update on EASA ELA was presented:
 - ★ NPA 2008-07;
 - ★ Comments received and general thrust of replies
 - ★ schedule for CRD and opinion



Summary/ Conclusions (II)

- **Permit to fly for LSA:**
 - ★ **Short term temporary solution for airworthiness**
- **Two steps approach was presented:**
 - ★ **ELA**
 - ★ **Task BR.010 and its supporting study**



Summary/ Conclusions (III)

- **Key issue for LSA/ ELA:
harmonisation with FAA**
 - ★ **Management has agreed for in-depth discussions on import/ export on LSA**
 - ★ **Teleconferences organised to**
 - ➔ Establish a comprehensive list of differences
 - ➔ Identify those that can be an issue
 - ★ **Report at the next Cooperation meeting (CMRT) late October:**
 - ➔ 3 focal points nominated



Summary/ Conclusions (IV)

- EASA have twice a year a meeting with recreational general Aviation
 - ★ **Adapt more and more the system and introduce tailor made regulation**
- EASA has nominated a focal point for recreational general aviation (M Borgmeier from R-Flight Standards)
 - ★ **One of his tasks will be to coordinate an action plan addressing not only existing issues but also issues to come.**
- EASA has nominated a focal point for business general aviation (W Sigl from R-Flight Standards)
 - ★ **One of his tasks will be to coordinate an action plan addressing not only existing issues but also issues to come**



**Thank you
for your attention**



Attachment 1: Overview of the comments received on NPA 2008-07

- The next 4 slides describe the **general thrust of the replies** but **this may still evolve** therefore:
- **Please refer to the CRD when published**



Overview of the comments received on NPA 2008-07

➤ The opinion to Part-21 and changes compared to the NPA (I):

★ *Type certificates and restricted type certificates:*

Why RTC for LSA

★ *Criteria for ELA 1 and 2:*

Some modifications to the boundary ELA1/ ELA2

Applicable CS and their intended evolution clarified.

CS-LSA: include a specification for minimum payload based on experience with micro-light in Europe.



Overview of the comments received on NPA 2008-07

➤ The opinion to Part-21 and changes compared to the NPA (II):

★ **Demonstration of capability for design:**

Minimum is still certification plan for ELA 1 and AP-DOA for ELA-2

DOA (with simplified Means of Compliance and standard handbook) and Combined DOA/POA remain available as options

★ **Demonstration of capability for production:**

Subpart-G of part-21 should apply

Development of a standard exposition

★ **Combined POA/DOA:**

Remain available as an option

★ **Qualified entities:**

Still under review by the Management Board.



Overview of the comments received on NPA 2008-07

➤ The opinion to Part-21 and changes compared to the NPA (III):

★ **Parts that don't need a form 1:**

Criteria improved

★ **Reference to ASTM standards in CS-LSA:**

CRD will explain how this can be done in a controlled manner

★ **Standard changes and repairs**

Concept will remain



Overview of the comments received on NPA 2008-07

➤ The opinion to Part-21 and changes compared to the NPA (IV):

★ **Harmonisation with FAA:**

Key issue because of the two different systems for Light Sport Aeroplanes (LSA):

- ➔ **EASA and China: 'Top-down';**
- ➔ **FAA and other countries: 'out of the box'**
- ➔ **Specific issues: standards; Airworthiness Directives, Acceptance of Parts**

LSA are designed and produced in many countries and international cooperation exist

Management agreement to a specific effort to allow smooth import-export.