



# EU Situation Overview

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- GLOBAL LSA System

# European Aviation Environment



## EUROPEAN UNION

- **European Parliament**
- **The Council of the European Union**
- **European Commission**
  - **EASA** – European Aviation Safety Agency
    - Basic Regulation (EC) 216/2008 (1592/2002)
    - Annex II of Regulation 216/2008, which defines aircraft exempted from EASA responsibility
      - these are in Member States jurisdiction
    - EASA Working Groups (MDM032, M017, etc.)
- **Eurocontrol**

# European Aviation Environment



## EUROPEAN ORGANISATIONS

- **EAS** – Europe Air Sports
  - EMF – European Microlight Federation
  - EGU – European Gliding Union
  - EHPU – European Hang Gliding and Paragliding Union
  - EPU – European Parachuting Union
  - PPL/IR Europe
  - Air Show Council
  - EFLEVA – European Federation of Light Experimental and Vintage Aircraft
  - EPFU – European Powered Flying Union
- **IAOPA** – International Council of Aircraft Owner and Pilot Associations
- **ECOGAS** – European Council of General Aviation Support
- **NAA** – National Aviation Authority

**ACTIVE EUROPEAN LIGHT MANUFACTURER  
ORGANISATION IS MISSING!!**

***LAMA-EU must be established***



# European Aviation Environment

**DEPENDS ON YOUR COUNTRY usually will be:**

- Your country Government
- Ministry of Transport
- Civil Aviation Agency
- Ministry of Industry
- Ministry of Defence
- Air Accident Investigation Bureau
- Air Traffic Control Agency
- National Aeroclub
- Sport Organisations

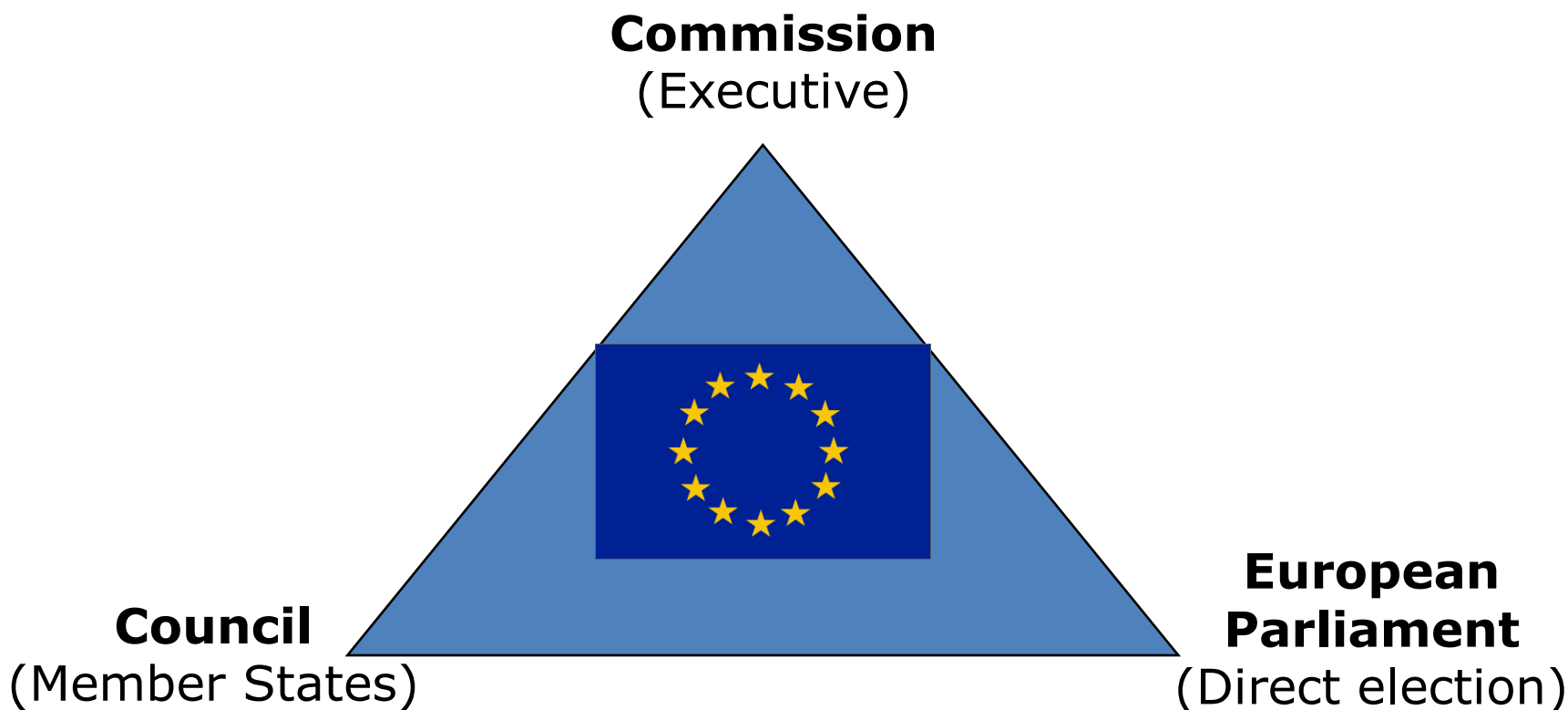


# Organisation of EU

- **The European Parliament**
- **The Council of the EU**
- **The European Commission**
- **Court of Justice**
- **Court of Auditors**
- **European Economic and Social Committee**
- **The Committee of the Regions**
- **The European Central Bank**
- **The European Investment Bank**

# EU Rulemaking

The Regulation - in our case the basic regulation on civil aviation - is made by the **TRANGLE OF POWER**





# EU Rulemaking

- Processes starts with the **Commission**. The Commission tends to be technocrat, but also political. Thinks European.
- The **Council** is the voice of Member States at all levels. May reflect discrepancies in national government policies. Tends to think national interests.
- The **European Parliament** is an entirely political body. Thinks European more than national (depending also on party politics). Thinks according to political lines.



# The European Commission – a key institution



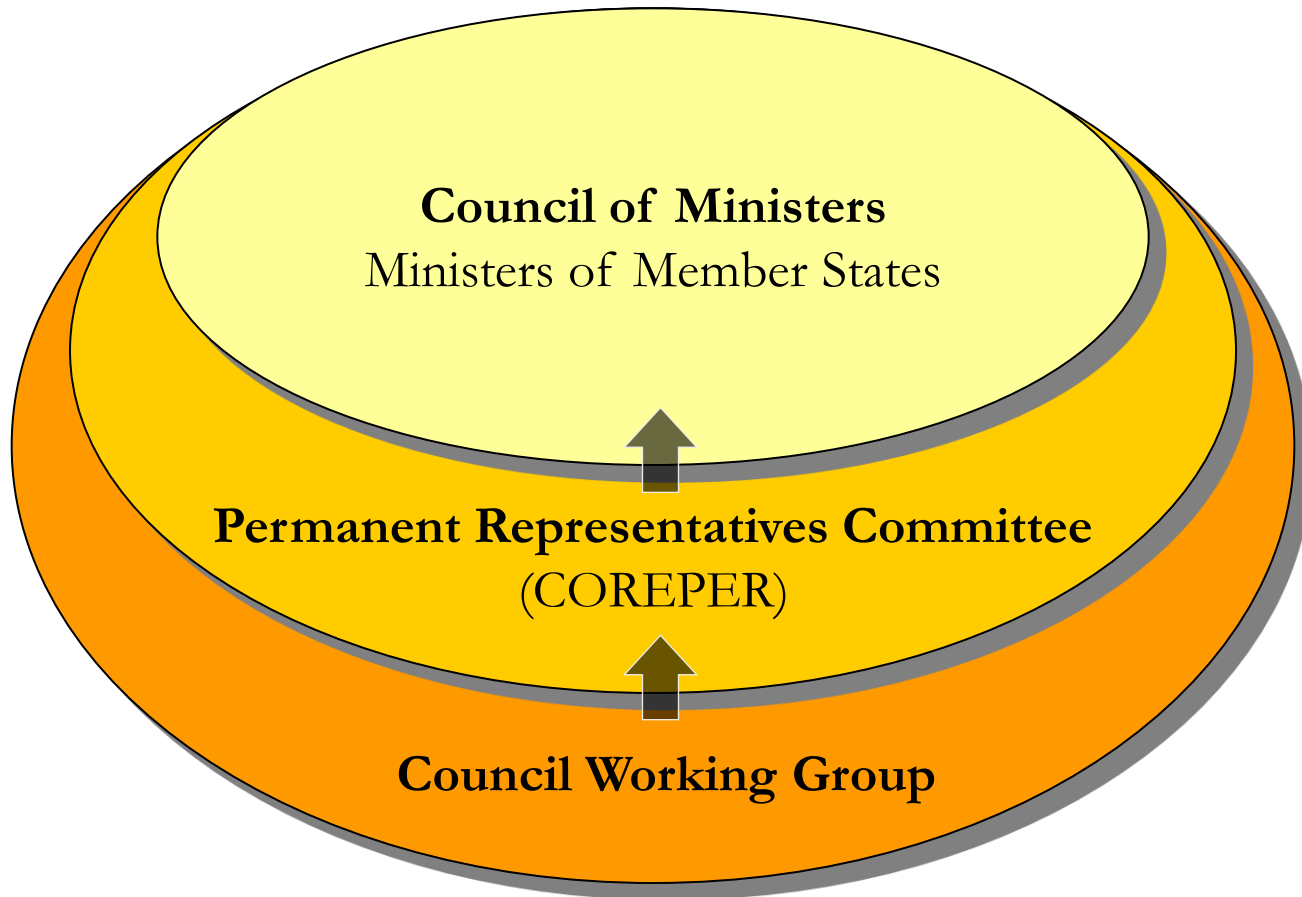
## Two major roles

- The Commission *initiates* Community policy
- The Commission ensures *proper implementation* of Community policy
- The Guardian of the Treaties
  
- **17 specialised policy Directorates-General (DGs) comparable to national ministries**
  - DG for Mobility and Transport – DG MOVE
  - DG Industry and Entrepreneurship

# EU Rulemaking

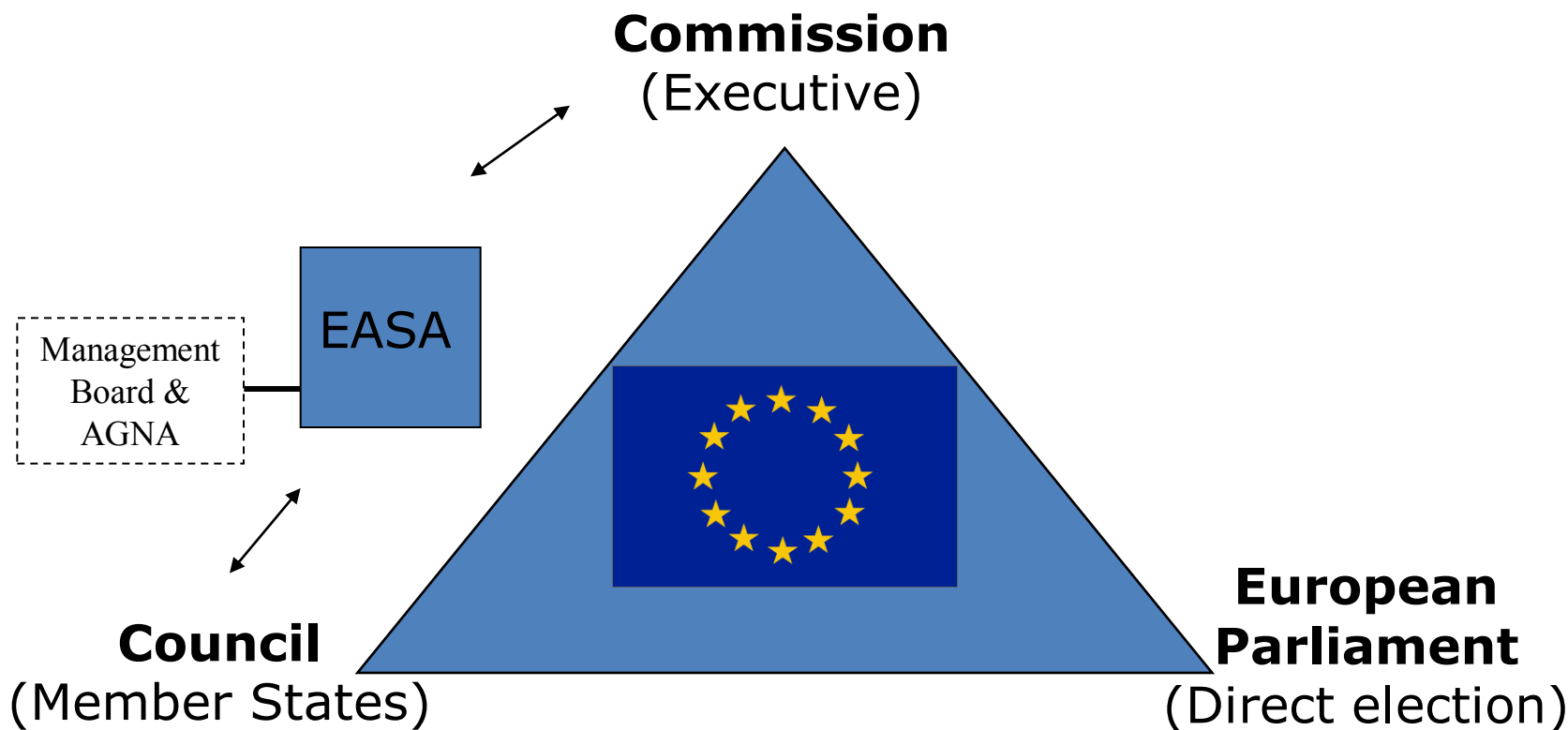


## Council



# EU Rulemaking

Politics do not decide on technical details they stay at a level of Essential Requirements. They created EASA to draft Regulation Proposals (Implementing Rules) for the Commission (in addition of its Certification job)



# EASA



## European Aviation Safety Agency

- In July 2002 the EU Council and Parliament have decided to apply common rules to aviation and to establish EASA
- Objectives: ensure a high and uniform level of protection of the European citizen and facilitate free movement of goods persons and services
- EASA is operational since September 2003
- EASA is located in Cologne
- Staff: more than 550 people
- Website: [www.easa.eu.int](http://www.easa.eu.int)



## The Basic Regulation 216/2008

- The Basic regulation of EASA is Regulation (EC) 216/2008
- **Basic regulations are not converted into national laws and apply directly**
- **Principles** (scope, objectives, definitions)
- **Substantive requirements** (basic principles, applicability, airworthiness, environmental protection, operations and licensing, recognition of certificates, etc...)
- **Organisation of EASA** (tasks, internal structure, working methods, financial requirements, final provisions)

## Present regulations structure

**Basic Regulation**  
**Regulation (EC) 216/2008 of 20/02/2008**

**ER :**  
**Annexes I to V**

**Agency**  
**Opinion**

Regulation (EC) 1702/2003 on  
 Airworthiness and Environmental  
 Certification

Regulation (EC) 2042/2003  
 on Continuing Airworthiness

**Agency**  
**Opinion**

**Annex (Part 21)**

*Section A: Application Requirements*  
*Section B: administrative Procedures*  
*Appendices: EASA forms*

**Annex I (Part-M):**  
**Continuing Airworthiness Requirements**

*Section A: Technical Requirements*  
*Section B: Administrative Procedures*  
*Appendices: EASA forms*

**Annex II (Part-145):**  
**Maintenance Organisation Approvals**

**Annex III (Part-66):**  
**Certifying Staff**

**Annex IV (Part-147):**  
**Training Organisation Requirements**

Guidance Material  
 Part 21

Certification Specifications

AMC 20	CS AWO	CS 22
AMC 21	CS ETSO	CS 23
CS 25	CS Definitions	CS 27
CS 34		CS 29
CS 36		CS VLA
CS E		CS VLR
CS P		
CS		
APU		

AMC & Guidance Material  
 Part M,  
 145,66,147

**Agency**  
**CS ,**  
**AMC &**  
**GM**

**Parliament and Council**

**European Commission**

**EASA**

## Rulemaking

- 3 types of regulation:
- **Basic Regulation** (216/2008) with Essential Requirements (ER), adopted by the Parliament (**Hard Law**)
- **Implementing Rules** (IR), adopted by the Commission
- **Certification Specifications** (CS), Acceptable means of compliance (AMC) and Guidance Material (GM) adopted by EASA (**Soft Law**)



# EASA

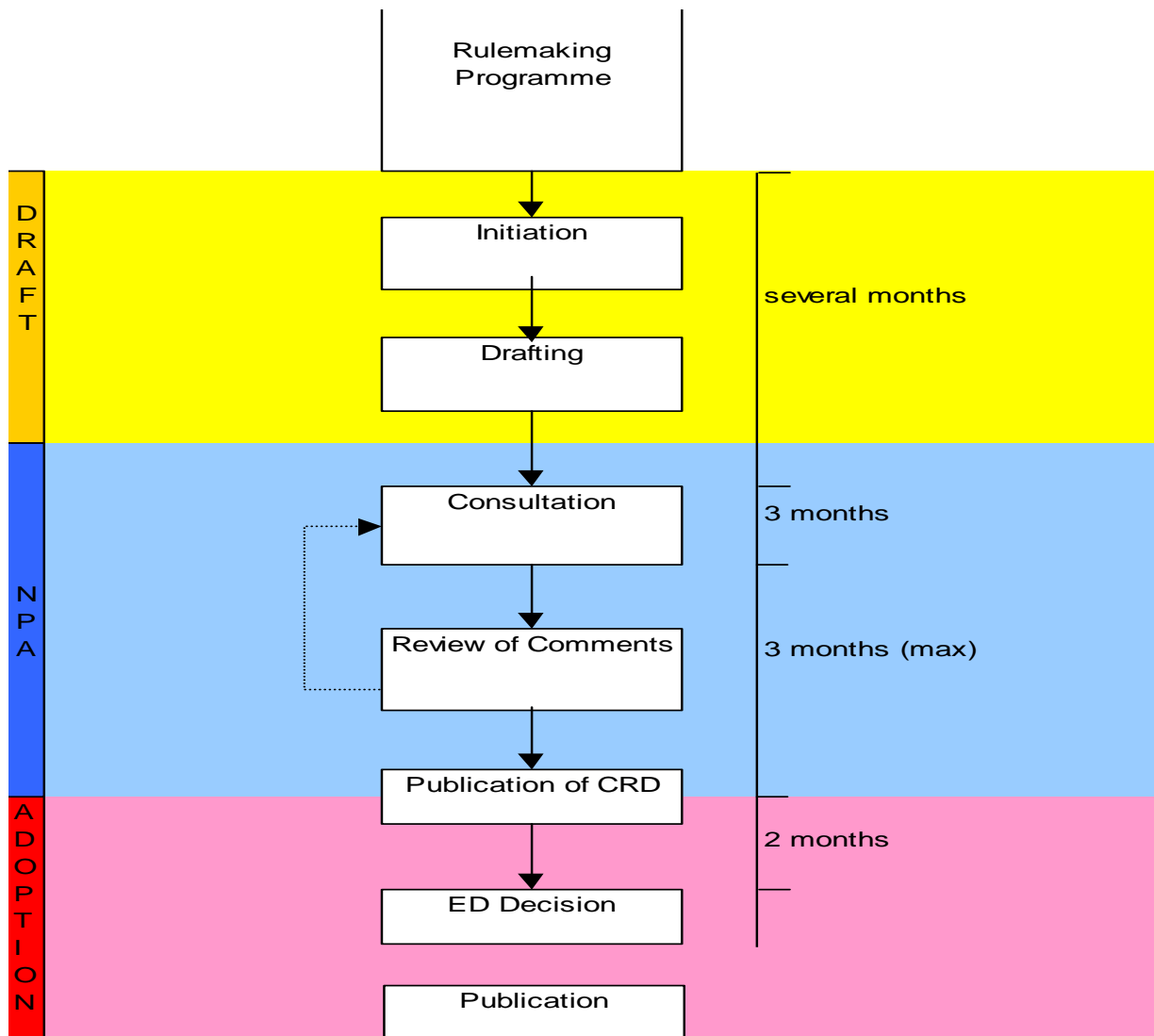
## Rulemaking Procedure

- For any change in Reg 216/2008 (Essential Requirements), EASA must issue a Notice of Proposed Amendment (NPA) and/or a Regulatory Impact Assessment (RIA)
- Stakeholders (we!) must be consulted
- Evaluation of the answers by an independent WG
- EASA issues a Comment Response Document (CRD)
- Stakeholders may comment again
- EASA issues an Opinion (draft of the new regulation) which is submitted to the European Commission
- The Commission issues a communication to the Council of Ministers and to the European Parliament, stating if they accept or reject the proposal
- If accepted the amendment is submitted to the Council and to the Parliament (Co-decision process)
- Publication of the new regulation in the Official Journal of EU
- **Process looks like democratic but it is very time consuming!**



# EU Rulemaking

## Rulemaking process flowchart



## 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-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](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](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](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](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](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.

# 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**



# European Light Aviation Industry

- more than 5 000 employes
- Annual production used to be more than 1600 aircraft, 2000 propellers and 1000 rescue systems
- **due to the economic crisis we expect the numbers for 2010 at least 30% lower**
- Most of the manufacturers are private and employ up to 25 people.
- main players are currently employing some 50 – 150 workers and have yearly turnovers of 3,5 milions € to 20 milions €.

**FOR LOBBYING PURPOSES WE NEED DO GET BETTER  
DATA FROM US!**



# European Light Aviation Industry

## 3-axis controlled Microlight &LSA numbers

	2006	2008	2010
Number of manufacturers	<b>103</b>	<b>127</b>	<b>133</b>
Number of Types	<b>141</b>	<b>180</b>	<b>183</b>
Number of produced UL&LSA	<b>1 600</b>	<b>1 400*</b>	<b>900*</b>

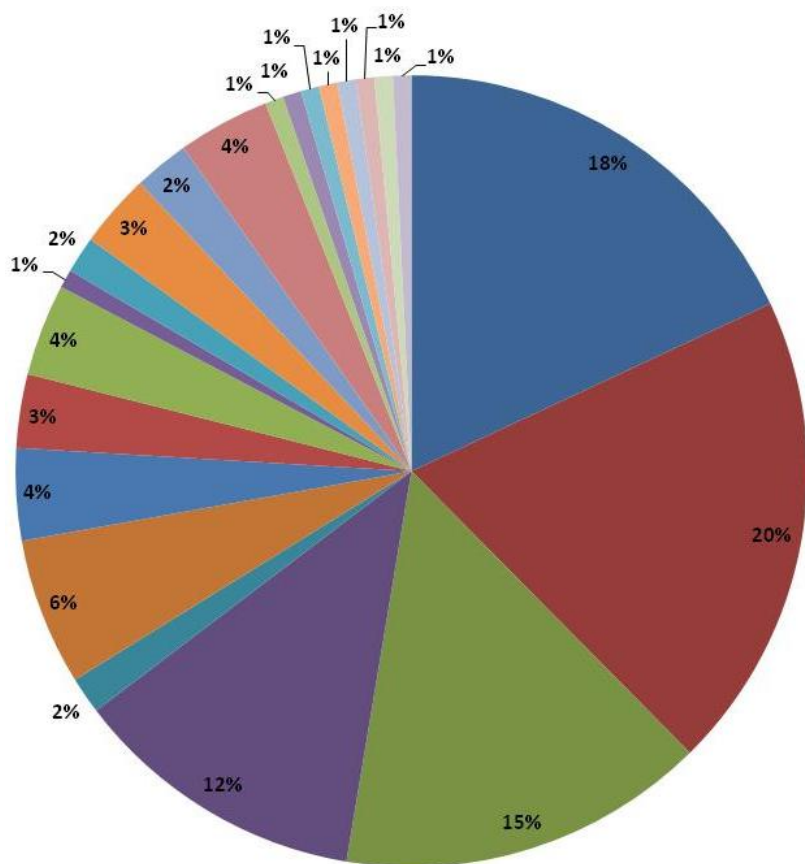
\* Estimation

Data based on Leisure Aviation Directory and personal research

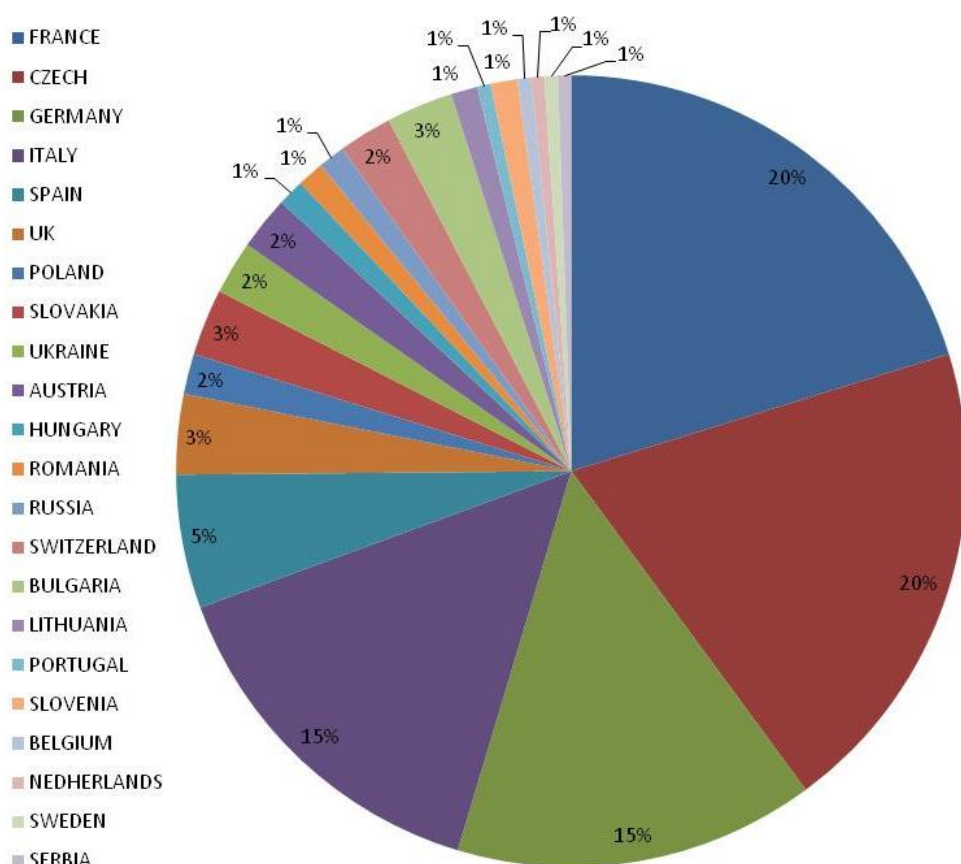
# European Light Aviation Industry

## 3-axis controlled Microlight & LSA numbers

2010 Number of Manufacturers per Country



2010 Number of Types per Country



Data based on Leisure Aviation Directory and personal research



# We need good European legislation

## COMPLETE PACKAGE for European LSA

- Airworthiness based on ASTM F2245
- Licencing (simple medical)
- Operations (definition commercial)
- Maintenance

**Success only if this will be ballanced**



# EASA proposed solution

## EXPECTED ADVANTAGES FOR MANUFACTURERS

- EASA TC valid in all EU countries
- Reduced production cost
- Hopefully less bureaucracy
- Future growth



# EASA proposed solution

## POSSIBLE RISKS

- EASA system is too complicated for small companies, it is not worth to build small aircraft even for big companies
- EASA fees and charges
- Need for quick solutions, the planes already exist!
- It is not clear if the whole system will work as a balanced package



# Identified problems

- Complexity and difficulty of new EASA proposed rules for sports and recreational aviation
- Need for establishing new LSA category – if possible GLOBAL
- Practical cooperation with EASA
- EASA fees & charges



# Perspective of EU Light Aviation

- Unclear future
- World wide crisis
- Microlight market slowed
- LSA in USA in recession
- No simple EU LSA rules ahead

# **We need**

- 1. Keep Annex II as long as possible in current wording, if possible extend it to include LSA**



**We need**

**2.** Solution of problem of (formal) limits of current microlight category – in reality often exceeded

# We need

## 3. GLOBAL LSA SOLUTION COMPLETE PACKAGE for whole WORLD

- Airworthiness – define realistic payload
- Licencing (simple medical)
- Operations (definition commercial)
- Maintenance

**Success only if this will be ballanced**

**We should really aim for GLOBAL  
LSA solution!**

# **Global LSA system – possible solution**



- **Establish and maintain a worldwide LSA definition – for example CS-LSA**
- **Allow use of common industry consensus standards (ASTM and possibly others) as a means of compliance for not only design but manufacturing, quality assurance, continuing airworthiness, maintenance, etc.**

# **Global LSA system**

## **– possible solution**



- **Required initial conformance check by Qualified Entity to assure manufacturer complies with standards (this would be instead of type certificate and DOA/POA and more than U.S. declarative system).**
- **Required periodic "audit" of manufacturer by Qualified Entity or delegated person/group (this could be LAA, LAMA, etc.)**



# **Global LSA system – possible solution**



- **Coordination between authorities worldwide on LSA consensus standards development and implementation.**
- **Coordination in gathering safety data and service data**



# **What can European Commission and EASA do for us**

- **Realize that Sports and Recreational Aviation needs different treatment and set of rules compared with CAT**
- **Create specific rules for the Sports and Recreational Aviation**
- **Cooperate with FAA to create Global LSA system**



# What can EASA do for us

- **Support our requests for change of EASA fees&charges**
- **Create Light Sport Directorate within EASA in order to address the needs of light industry**
- **Invite representatives of Microlight & LSA industry to working groups dealing with Annex II or LSA**



**Will LSA work in Europe?**

**It must work!**

**BUT:**

**If we will just sit and wait we will probably not get what we wanted!**



# WHAT SHALL WE DO?

## MANUFACTURERS NEEDS LAMA EU

- For lobbying purposes
- In order to get involved in various working groups of different EU institutions
- As partner for other European organisations like GAMA, EAS, AOPA etc
- To prepare clear industry positions papers to various problems affecting the light aviation industry

# WHAT SHALL WE DO?

## LOBBY!!

- on all levels starting with national politicians
- We need to reply to all relevant EASA NPA
- We need to explain to European Commission what we want – GLOBAL LSA
- This message must come from all organisations representing Sports and Recreation Aviation as well as from the manufacturers
- Get press on our side



# **Thank You for Your attention!**

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