



# EGU Newsletter 1/2018

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## Editors note

On the EGU website <http://www.egu-info.org> you find a lot of useful information. If you have forgotten the password to the internal section, please contact EGU.

## A report by the President

Patrick Naegeli

On 28 February, EASA rule making task workgroup RMT.0701 submitted the draft of the new Implementing Rules ("IRs") for the revised gliding regulations that will, it is hoped, become law in April 2020. The IRs were accompanied by four other documents that are required by the EASA rule making and subsequent legislative procedures:

- *Guidance Materials/Acceptable Means of Compliance* – supporting documentation that is intended to provide guidance and example methods for adopting IRs. In contrast to the IRs, GM/AMCs are not legally binding.
- *Comparison Table* – highlighting the key differences between the current and new rules.
- *Justification Table* – makes the case for the introduction of new rules.
- *Regulatory Impact Assessment* – a detailed assessment of the implementation implications for new rules. Ideally, new rules should not make life more difficult for any affected party.

RMT.0701 was staffed by three EGU Board members, representatives from a number of national aviation authorities ("NAAs"), three EASA staffers and three invited observers. The group worked on the development of the new rules over a period of approximately 18 months

and identified a number of issues that had the potential to complicate the process of reducing the regulatory burden on gliding. Whilst we were not always able to persuade the NAAs on the RMT to appreciate things from our perspective, we were mostly able to arrive at a set of satisfactory compromises and achieve material improvements from the current rule base.

If the draft rules pass through the remainder of the EASA and European Commission/Parliament processes with little in the way of change being made, then we will have achieved:

- A simpler licence structure, ICAO by default, that will allow a glider pilot to hold one licence and have their privileges vary depending on the level of medical that they hold.
- A more straightforward and less bureaucratic/costly set of procedures for the addition and maintenance of flight privileges that a pilot acquires following the initial issue of their glider licence. The new rules will allow more of the responsibility for the actions needed to train for, and grant flight privileges (e.g. new launch variants, aerobatic and cloud flying, instructing, etc.) to be handled within appropriate training organisations operating under the auspices of a competent authority.
- Greater opportunity for individual nations to manage their gliding activities as they see fit – achieved by moving as much as possible out of the IRs and

capturing the intended effect in the GM/AMCs instead.

- The possibility for individual nations to introduce a separate, sub-ICAO licence with modular privileges – an idea that builds on an EASA opinion published at the end of 2017 for the power flying community. Whilst this form of licence can only be used within national borders, it will provide nations with the ability to continue with national practices that would otherwise disappear under EASA rules.

The draft new rules are with EASA, and it is now responsible for completing the process of progressing them through the remainder of the regulatory process. This will take time and it is possible that the final approvals will not be granted until late 2019 or early 2020 – a relatively short period of time prior to the final deadline for the adoption of EASA regulations for gliding of April 2020.

**It is absolutely vital that all EGU members work closely with their NAA in order to ensure that it will do what it can to support the process for the adoption of the new rules. In June 2018, EASA will host a major consultation workshop in Cologne. All interested stakeholders will be able to attend and express an opinion on the draft rules. Please ensure that your NAA goes to that meeting with the intention of expressing its support. We cannot stress how important this is – not everyone is very familiar with gliding and so may not properly appreciate why it is not just safe but also reasonable to relax the current rules.**

As soon as we can circulate more information on the draft rules to EGU members we will. For the moment, however, EASA are treating the drafts as confidential and are stressing that further changes may need to be made, which makes too early a circulation of materials unwise. If you have any immediate questions or would like to discuss any aspect of the work of RMT.0701, please let us know.

EGU members met in Paris a short while ago for our annual congress. Our colleagues in the FFVV

organized an excellent meeting – and good weather as a bonus. We thank them for all of their hard work on our behalf. The meeting was very well attended, and whilst we spent most of the time focused on EASA-related matters, we did have the opportunity to examine other important developments, for example: airspace, technology and conspicuity, medicals, etc. I would hope that within the next 12-18 months, we will be able to redirect more of our efforts to non-EASA matters and ensure that we are appropriately populating and balancing our list of priorities.

At the conclusion of our annual conference, we elected three new members to the EGU Board: Ole G. Andersen (Denmark), Bernard Hautesserres (France) and Andreas Peus (Germany). We thank them for volunteering to support the EGU through the next stage in its activities, and look forward to working with them closely over the coming months.



*Congress delegates*

As I close my column, I would like to do two things.

Firstly, I'd like to express my gratitude to two members of the EGU Board that retired at the end of the annual meeting. Meike Müller and Günter Bertram have both been long-standing members of the Board. They brought a wealth of gliding experience, expertise and a detailed working understanding of the national administration of gliding to their work. Meike was the EGU's lead on medical matters and played a key role in the recent re-writing of the gliding rules for EASA. Günter is a recognized expert in all matters related to airspace and has chaired the EGU's Airspace Group and annual meeting over many years. We have all benefited from their dedication in working for the rights

and freedoms of European glider pilots. Whilst they have formally retired from the EGU Board, I very much hope that both will be able to find the time to remain closely associated with the work of the EGU.

Secondly, on behalf of the EGU, I'd like to send best wishes to David Roberts, a past member of the EGU Board and who has just retired as Europe Air Sports President. David has served us all magnificently over many years.

The weather is in the process of changing from winter to spring, and I hope that good gliding conditions follow for you all.

Have fun, stay safe.  
Patrick Naegeli

## Part-Gliding Licences – a summary TO Training Andy Miller

The first phase of work for the licencing aspects of Part-Gliding, with the EGU in the lead, has finished (see the Presidents report) ; leadership now passes to EASA itself. The Agency will next complete its own internal requirements and make sure that proposals will be acceptable the EU Commission.

While EASA carries out this phase of the work, draft text may not be shared outside the Agency.

Two workshops had prepared EGU views well so an important part of this first phase was to involve the national/ competent authorities. We needed to develop a good understanding of their views and either adapt or put worries to rest.

In outline, the main changes from Part-FCL that we propose are:

- A single licence with privileges, ICAO or not, that depend on the medical held.
- Arrangements for licence entries to be made by authorised examiners or instructors instead of national/ competent authorities
- Removal of the TMG hours limit from the requirements for licence issue
- Allow the supervised solo launches required for self-launch training to be flown in a TMG.
- A two stage aerobatics rating. Training and privileges of the second stage will be identical to

the existing rating; training and privileges of the first stage will be limited to very basic manoeuvres.

- TMG banner towing and mountains not included
- Requirements for sailplane cloud flying aligned with other extensions of privileges: satisfactory completion of training but no skill test.
- For instructor training, enable instruction of actual students to be part of the course.
- Instructor revalidation requirements improved



## Airworthiness and Maintenance TO AW&M Howard Torode

### Implementation Timescales particularly for Engineer Personal Licensing under Part 66.

Most recent information received from EASA in January suggests that while the EC Opinion on Engineer Licences in Light aviation was approved during 2016, there remain complications in its administration into law. The regulation remains close to being issued, and we are concerned that this rule may be laid upon us at very short notice and may raise issues in unprepared nations. The education and inception processes still need to be interpreted. We might anticipate a two year implementation process after a final entry into law, so a transition period from late 2018 to 2020 might reasonably be assumed, but one year of this will be taken up with process changes in NAA's. A transition starting later in 2019 would allow better preparation.

### Part ML/CAO (General Aviation Task Force 2).

The final step in simplifying Airworthiness rules will be Part M Light. This development had been

on a fast track for European Parliamentary signature during 2017, but at year's end no progress can be reported. (Similar issues to Part 66L delay above have been mentioned).

From the outset, PML is designed as a separate code from Part M itself. It will be the ONLY code applicable to non-commercial operations of ELA aircraft and separation from the wider issues pertinent to complex aircraft and commercial operation. The amalgamation of Airworthiness and Maintenance requirements will reduce unnecessary complicated documentation.

### **NPA2017-19 Aircraft parts issued without Form 1**

(Information: A 'Form 1' is the EASA certificate releasing an aerospace qualified component)

This short NPA should enable constructors and owners alike to fit and replace parts not specifically produced to aerospace standards. This should be a helpful measure particularly for sport aviation and sailplanes, but the procedures appear heavy and complicated. EGU plans to comment on this proposal via Europe Air Sports.



### **Review of the EASA Basic Regulation TO AW&M Howard Torode**

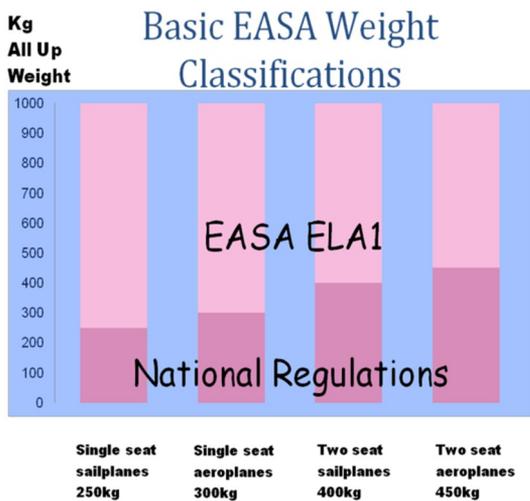
The EASA 'Basic Regulation' is only revisited once per decade, and the measures within this substantial document (over 200 pages) set the approach to EASA legislation in the longer term. On 15 December 2017 the Council of Europe issued Document 15689/2017. This major proposal on common rules for all of aviation, replacing former EC216/2008, will be voted by the European Parliament. EGU continues to work through Europe Air Sports (EAS) promoting our interests and seeking a full role of Sport Associations in our communities. Key issues for us in gliding are the role of 'Qualified Entities',

and the range of airframes that are require EASA regulation.

'Qualified Entity' is a status awarded to private organisations (such as National Sporting Associations), permitting it to act on behalf of the National Authority in the delivery of certification and licensing services. The liberalisation of their operating terms is important to gliding since, until now, the regulation have precluded Sport Association taking full effective management of their own communities, largely because of concerns over impartiality and conflict of interest issues. These are completely different between commercial and sport aviation. The new rules have resolved many of these conflicts for sport associations, which should enable you to take over additional role that may have been taken over by your NAA, should you so wish to do so. These might include for example: the provision of glider pilot licences or administration of ARC issues. Your association might well revisit their relationship with you NAA particularly if you feel you have lost any privileges during the original transition to EASA.

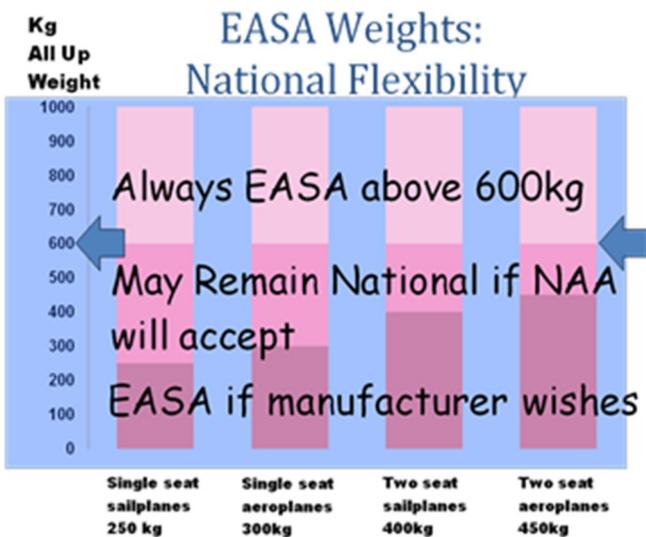
EASA certification is currently required of all **new** unpowered sailplanes designed within the community of empty weight of greater than 80kg. This contrasts with a limit of 300kg (SS, all-up) for similar micro-light powered aircraft. We have vigorously campaigned that these standards should be harmonised to a single mass criterion regardless of motive power or occupancy, in the interests of a common development path for efficient light sport airframes. Sadly this approach was rejected, and in the new EASA BR continues in micromanaging weight limits for a wide variety of cases and equipment fits. Other issues where no progress was made were the criteria applied to home and kit built airframes (still 51%), and unchanged basic stall speed criteria.

There is however good news in this. The single seat sailplane weight limit is now revised 250 kg (all up), with similar alleviations in weight (and stall speed)for other airframe classes as shown in the accompanying diagram (left). Note that there is no distinction between an aeroplane and a powered sailplane.



The overall final compromise result was limited by:

- An aggressive and vocal micro-light lobby
- Protectionism from some quarter of our own industry
- A varied and largely un-enthusiastic support from NAA's



This also shows a new opportunity to raise the national limit further with the agreement of the national authority under which it will be controlled (see right hand diagram). In all cases of national certification such aircraft can of course only operate freely within the airspace of the certifying country, as currently applies to 'Annex II' airframes (now to become Annex 1 in the new document).

While all of this is not what we sought, it represents a welcome extension for those nations whose NAA's who permit this. Given the offered alternative empowering national flexibility, we find this an acceptable solution, although it may not be an option in some countries.

*The EGU is the association of European Gliding Federations or Gliding Sections of National Aero Clubs.*

*Its aim is to represent the interests of all glider pilots in Europe with respect to regulatory affairs.*

*EGU monitors the developments in European aviation regulation and when necessary, takes action to prevent unfavourable or even dangerous rules affecting our sport from being set up.*

*The EGU currently counts 18 full members and represents more than 80,000 glider pilots*