



EUROPEIAN GLIDING UNION

Representative Organisation of European Glider Pilots

EGU 's comments on CRD to NPA 2009-02b

Part-CAT

Part-CAT continues to apply a disproportionate level of complexity to the operation of sailplanes, touring motor gliders and towing aircraft. EGU believes that glider activities in all our clubs cannot be identified as something like commercial air transport, so we see the need for a less burdensome treatment here.

Part-SPO

Gliding is an air sport, so that means that we have competitions and these activities are in our eyes not a special operation, it is part of our normal operation. Glider towing is one of several ways for a sailplane to get airborne and we do not see this as a special operation at all. In most member states competition flights and glider towing has been seen as a non-commercial and non-complex activity. So when we noticed that EASA in part-SPO presented that aerial work activities, including commercial & non-commercial activity, such as towing of gliders listed as a special operation we find this remarkable. In many member states, glider towing has been exempted from aerial work requirements and that this activity that occurs in gliding clubs is not a commercial activity.

EGU believe that gliding club activities relating to sailplanes, such as competition flights and glider towing should be subjected to part-NCO. Glider towing should be excluded from part-SPO.

EGU

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