



General Question for Competent Authorities

How will the entry into force of Part M Section B (Procedure for Competent Authorities) affect your Authority?

European Gliding Union (EGU) Answers to Questionnaire

The EGU is the association of European National Gliding Bodies (Gliding Federations or Gliding Sections of National Aero Clubs). Its aim is to represent the interests of all sailplane pilots in Europe with respect to regulatory affairs. The EGU currently counts 16 full members (Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Italy, Ireland, The Netherlands, Norway, Slovakia, Slovenia, Sweden, Switzerland and United Kingdom) and represents 80,000 sailplane pilots flying about 18000 sailplanes and powered sailplanes.



1 Management of Components (Part M Subpart E)

(Please consider the impact regarding safety, economic, social and other aspects in the field of aviation)

<p>1.1.</p>	<p>Reference M.A.502 (a) (Component maintenance)</p> <p>What is the effect on you or your organisation of the limitation that only Part 145 or Part M Subpart F organisations may maintain components?</p>	<p>If our understanding of the regulation is correct, all club workshops will have to become Part M subpart F organisations for being allowed to continue to maintain components (and complete aircraft).</p> <p>This is a radical change as compared to the situation existing in most European countries for more than 50 years, where the national policies have encouraged a de-regulation or delegation from National Airworthiness Authorities to the National Gliding Bodies (NGB). In these countries, sailplanes, powered sailplanes and tow planes are maintained in the framework of clubs, generally by inspectors trained and licensed by the NGB. A quality control is ensured by audits performed by a technical staff employed by the NGB. This system has proven to be cost effective and reasonably safe since the rate of accidents due to poor maintenance is extremely low.</p> <p>We therefore do not see any reasons to change for a system which will dramatically increase the costs and the bureaucratic burden without improving safety.</p> <p>Additionally it is to be noted that there is a problem that the term “maintenance” does not distinguish between different types of maintenance, e.g. functional testing or installation/removal versus operations actually being an intrusion into the component. The requirement that components may only be removed for maintenance “when such removal is expressly permitted by the aircraft maintenance manual” is unnecessarily strict, particularly because maintenance manuals for sailplanes and light aircraft do not usually specify allowable removal/installation of components to this degree of detail. This particular requirement should be deleted.</p>
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<p>1.2.</p>	<p>Reference M.A.606 (g) & Part 66.A.200 (Certifying staff)</p> <p>National regulations regarding the qualification and experience of certifying staff are retained for the Release to Service of components until specified by Part 66. What effect will this have on the acceptance of components by your organisation?</p>	<p>We see no problem in the principle of accepting components certified by certifying staff qualified under National requirements.</p> <p>This applies to gliding since according to Part 66, Subpart B, Part 66 does is not valid for CS-22 aircraft, therefore national regulations regarding the qualification and experience of certifying staff remain valid for sailplanes (66.A 100) as well as for components (66A.200)</p> <p>However in practice, there is no definition existing for such staff in the national regulations in gliding. In most European countries the certifying staff is defined within the National Gliding Bodies and the licences for those staff are issued by the National Gliding Bodies but not by the National Aviation Authorities. The Competent Authority will have to recognise the qualifications of these Sailplane Technicians (or whatever we call them) and allow them to issue Certificates of Release to Service.</p>
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<p>1.3.</p>	<p>Reference M.A.504 (d) (Control of unserviceable components)</p> <p>How are 'unsalvageable components' controlled by the owner/operator/organisation and what effect will the controls introduced by Part M have?</p>	<p>No additional effect.</p>
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Comments on Rule M.A.302

The individual maintenance programme required for each sailplane or powered sailplane is totally unnecessary. For a relatively simple aircraft like a sailplane or a powered sailplane, the maintenance program established by the manufacturer associated to the records of performed maintenance operations in the logbooks should be largely sufficient to ensure safe maintenance.

If we assume the cost of setting up one manual to be 100 Euro (which is probably underestimated) This unnecessary requirement for setting up 18.000 individual maintenance manuals would cost about 1.8 Millions Euro to the European Gliding Movement. This is totally unacceptable !



2 Maintenance Organisations (Part M Subpart F)

(Please consider the impact regarding safety, economic, social and other aspects in the field of aviation)

<p>2.1.</p>	<p>Reference M.A.603 (Extent of approval) & M.A.607</p> <p>The extent of a Subpart F approval may include complex tasks (appendix VII), which are excluded from the limitations of a Part 66 license. Is this limitation clear for one-man organisations and how would this requirement affect your scope of work?</p>	<p>We do understand neither the regulation nor the question...</p> <p>There are no one man organisations in our clubs but there are some commercial one-man workshops in gliding. We hope that they will be able to continue to work according to their qualification which in most countries were classified according to the fields in which they are allowed to work such as structures (wooden, metal or composite), engines etc...</p> <p>Furthermore we would like to point out that many of the tasks considered as complex in Appendix VII are currently performed in our club workshops. For example repairs on the composite skins and sandwiches were up to now classified in 4 categories depending on size and complexity and only class 4 was considered as being not feasible in a club workshop environment.</p>
<p>2.2.</p>	<p>Reference M.A.604 (Maintenance organisation manual)</p> <p>What effect does the introduction of the following Subpart F requirements have on your organisations?</p> <ul style="list-style-type: none"> a) An organisation manual? b) Facilities for all planned work, office accommodation and component storage? 	<ul style="list-style-type: none"> a) Except in France where there are UEA equivalent to the subpart F organisations, most club workshops will have to set up an organisation manual if they want to apply for becoming a subpart F organisation. This will increase their administrative workload and probably also cost money without real safety benefit. b) Most club workshops have already the required facilities, office accommodation and component storage



	<p>c) Personnel requirements (managers, maintenance staff, workshop staff, demonstration of qualifications, personnel carrying specialised work.)</p> <p>d) Certifying staff authorisations?</p> <p>e) Tools & equipment?</p> <p>f) Maintenance data?</p> <p>g) Maintenance records?</p> <p>h) Storage of documents?</p>	<p>c) Most club workshops are too small to have separate maintenance and workshop staff. Most of the people working in these workshop work on a voluntary basis and are trained and licensed by the National Gliding Bodies. Their qualifications will have to be recognised by the Competent Authority..</p> <p>d) See 1.2</p> <p>e), f) , g) and h) The clubs have generally the required tools & equipment, maintenance data, maintenance records and storage facilities</p>
2.3.	<p>Reference M.A.606 (d) (Personnel requirements)</p> <p>What effect will the regulation regarding the use of sub-contractors have on your organisation?</p>	<p>No foreseeable effect</p>
2.4.	<p>Reference M.A.606 Personnel requirements</p> <p>How do you see a one-person Subpart F organisation working within the requirements of this subpart especially regarding the certification requirements?</p>	<p>A one person Subpart F organisation will incur administrative burdens to meet certification approvals that are likely to result in an unworkable situation in sport aviation maintenance where the difference between profit and insolvency is frequently marginal.</p> <p>We hope that these one man organisation will not be overloaded with administrative work and will survive the new regulations because the gliding movement needs them.</p>
<p>Comments</p> <p>Rule MA 610 which requires the issuing of written orders for each individual maintenance operation is an unnecessary bureaucratic burden in a club workshop environment.</p>		



3 Continuing Airworthiness Management Organisations (Part M Subpart G)

(Please consider the impact regarding safety, economic, social and other aspects in the field of aviation)

Note It is accepted that these organisations are not in existence at this time, therefore these questions should be answered by the person who performs these activities i.e. owner, operator, or maintenance organisation.

<p>3.1.</p>	<p>Reference M.A.703 (Extent of approval)</p> <p>How does the introduction of an approval for Continuing Airworthiness Management effect you as an owner/operator/organisation?</p>	<p>If we understand the regulation correctly, the National Gliding Bodies will have to set up one or more Subpart G organisations if they want to continue to maintain their sailplanes under delegation from their NAA. This or these Subpart G organisations will have to manage the airworthiness of the sailplanes maintained in the sub part F organisations of the club workshops</p> <p>We feel that in such a system, there will be considerable overlap in the work required to be carried out by the Subpart G and the Subpart F. For example it is not clear whether the individual maintenance of every aircraft will have to be developed by the Subpart F or the Subpart G organisation.</p> <p>We believe that this Subpart G organisation will be an additional administrative level which will increase the bureaucratic burden and the maintenance costs without real safety benefit</p>
<p>3.2.</p>	<p>Reference M.A.704, 705 & 706 (Exposition, facilities & personnel)</p> <p>What effect does the requirement for the following have on your organisations responsibilities for continuing airworthiness management tasks?</p> <ul style="list-style-type: none"> a) Continuing airworthiness management exposition b) Facilities c) Nominated personnel d) Quality system e) Record keeping 	<p>These rules imply a severe increase of requirements for sailplane and light aircraft maintenance with respect to personnel and staffing, facilities (in particular office facilities), quality assurance and paperwork. These rules appear to have been developed with a relatively large commercial maintenance organisation in mind.</p> <p>In particular in small countries (Belgium, Denmark, Norway) ,the National Gliding Bodies which have a continuing airworthiness management system based on voluntary people will obviously have to engage paid staff. This will dramatically affect the cost of maintenance.</p>



	<p>f) Maintenance data g) Scope of work?</p>	
3.3.	<p>Reference M.A.707 (Airworthiness review staff)</p> <p>What effect will the requirements for Airworthiness Review staff have on your organisation?</p>	<p>This rule is unacceptable for the gliding community because it is totally unaproprate to the level of simplicity of the sailplanes maintained.</p> <p>It must be recognised that for the light aircraft industry, there are very few Part 66 licensed engineers. Generally, these engineers are licensed under national requirements (BCAR Section L in the UK) for light aircraft, or are approved by National Gliding Bodies in the case of sailplanes.</p> <p>This rule must be relaxed either by authorising personal not having a Part 66 license to issue airworthiness review certificates for light aircraft and sailplanes or by creating a dedicated license for non complex aircraft with MTOM below 2730 Kg.</p>
3.4.	<p>Reference M.A.708 (Continuing airworthiness management)</p> <p>How will you be affected by the requirement to have the continuing airworthiness management tasks performed as listed in M.A.708?</p>	<p>This rule is also completely unacceptable for the gliding community.</p> <p>To draw up individual maintenance programs for about 18.000 sailplanes is a huge paperwork almost impossible to fulfil in a volunteer environment. Since there are existing manufacturers type-specific Maintenance Manuals, AD's and service-bulletins we do not see the need of for such maintenance programs for simple design products like sailplanes and powered sailplanes. Furthermore the National Airworthiness Authorities will probably not have the capacity to approve such a high amount of programs in a reasonable time.</p>
3.5.	<p>Reference M.A.710 (Airworthiness review)</p> <p>What effects will the requirement for an Airworthiness Review every year or (every three years in a controlled environment) have to you?</p>	<p>The requirement for an AR every year is acceptable in terms of safety since most EU gliding organisations currently perform annual airworthiness reviews coinciding with an annual inspection. However, in the context of Part M there will be significant additional economic burden to the owner operator. A 3-year AR within a controlled environment is unlikely to reduce the economic burden because of the additional costs of operating in a controlled environment.</p>



		710 (b) introduces an additional requirement to 707 (a) since Airworthiness review staff not qualified to part 66 will have to be assisted by such qualified personal. This is not acceptable for gliding since Part 66 does not apply to sailplanes.
3.6.	<p>Reference M.A.711 (b) (Privileges)</p> <p>Will your organisation be requesting the additional privilege of an approval for the issue or recommendation of an Airworthiness Review Certificate? If so, do you foresee any problems?</p>	<p>If the NGB would have to set up Subpart G Organisations they would certainly request this privilege because this would be the only advantage of such a system.</p> <p>The problems we foresee are again related to the fact that we have no Part 66 licensed personal to issue the ARC since Part 66 does not apply to gliding (See 3.3 and 3.5).</p>
3.7.	<p>Reference M.A.712 (Quality system)</p> <p>What effect does the requirement for a quality system have on approved organisations responsible for continuing airworthiness tasks?</p>	<p>The quality system should adapted to the type of aircraft and risk of activity in order to avoid an unnecessary cost burden and workload.</p> <p>Most National Gliding Bodies have already a simple quality system which has worked satisfactorily for years. These systems should be kept as simple as they are.</p>
Comments		



4 Certificate of Release to Service (Part M Subpart H)

(Please consider the impact regarding safety, economic, social and other aspects in the field of aviation)

<p>4.1.</p>	<p>Reference M.A.801 (Aircraft certificate of release to service)</p> <p>A Certificate of Release to service (CRS) can only be issued by: -</p> <ul style="list-style-type: none"> (a) M.A.Subpart F certifying staff (b) Part 66 licensed personnel (c) Pilot-owners (limited) (d) Part 145 certifying staff <p>How will this requirement affect you as an owner/operator/organisation?</p>	<p>(a), (b) As mentioned above in 1.2 and 2.2 there is a problem here because Part 66 is pointing to national regulations for gliding but in most European countries there is no definition existing for such staff in the national regulations.</p> <p>In most European countries the certifying staff is defined within the National Gliding Bodies and the licences for those staff are issued by the National Gliding Bodies but not by the National Aviation Authorities.</p> <p>Sailplane Technicians (or personal holding an equivalent national rating) should be allowed to continue to issue certificates of release to service for sailplanes and powered sailplanes.</p> <p>c) The fact that the rule states that a pilot owner may perform limited maintenance on an aircraft is very positive. We would nevertheless like this privilege to be extended to club workshops because club members working in such a structure are also to be considered as part owners.</p> <p>Furthermore some of the operations included in the list of approved maintenance operations should not be subject to a CRS if they are described in the aircraft flight manual produced by the manufacturer as pilot operational activities. In particular rigging of sailplanes prior to flight or de-rigging after a flight which is often done daily is integral to the pilot pre-flight inspection and should not be subject to a CRS.</p>
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<p>4.2.</p>	<p>Reference M.A.803 (Pilot-owner authorisation)</p> <p>What effect will pilot/owner maintenance have on the maintenance of the aircraft?</p>	<p>For sailplanes and powered sailplanes we would like the maintenance related activity described in the aircraft flight manual produced by the manufacturer to be recognised within the scope of pilot-owner maintenance. Additionally, the manufacturer approved limited pilot-owner maintenance activity within the aircraft maintenance manual should be included within the scope of pilot-owner maintenance.</p> <p>This has in fact been the common practice for many years. For example the 25/50 and 100 hour inspections of powered sailplanes have been conducted by pilot/owners for decades without any safety problem.</p> <p>Additionally the scope of the pilot owner allowed maintenance should be widened to encompass the removal and installation of non TSO'd instruments on a non hazard basis.</p> <p>The existing Appendix 8 limited pilot-owner maintenance list should therefore be extended accordingly.</p>
<p>Comments</p>		



5 Airworthiness Review Certificate (Part M Subpart I)

(Please consider the impact regarding safety, economic, social and other aspects in the field of aviation)

5.1.	<p>Reference M.A.901 (Aircraft Airworthiness Review)</p> <p>What effect will the requirement for an Aircraft Airworthiness Review have on you as an owner, operator or organisation?</p>	<p>The requirement for an Aircraft Airworthiness Review is accepted provided the Airworthiness Review Certificate can be issued by a Subpart G Organisation set up by the National Gliding Body without a too heavy bureaucratic burden.</p>
5.2.	<p>Reference M.A.901 (a) (Aircraft Airworthiness Review)</p> <p>An Airworthiness Review Certificate required to validate a Certificate of Airworthiness will be valid for one year. How will this requirement affect you as an owner, operator or organisation?</p>	<p>There is no significant effect since in most countries similar procedures are already existing.</p>
5.3.	<p>Reference M.A.901 (Aircraft Airworthiness Review)</p> <p>What effect will the issuance and recommendation of an airworthiness review certificate by a Subpart G organisation have?</p>	<p>There will be an increased administrative burden and increase in the maintenance costs associated to the operation of the Subpart G Organisation.</p>
5.4.	<p>Reference M.A.903 & 904 (Transfer of aircraft)</p> <p>How will the requirement for airworthiness review certificates affect the transfer of aircraft;</p> <ul style="list-style-type: none"> a) within the European Union? b) into the European Union? 	<p>The fact that all sailplanes within the European Union will have the same requirements for airworthiness review certificates will make the transfer within the Union more easy because of the better tracability.</p> <p>Transfer from outside the European Union will be more difficult and a procedure should be set up for the importation of such sailplanes (For example Airworthiness Review performed byan inspector from the National Gliding Body).</p>

