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Title	Contracting of continuing airworthiness management activities
NPA Number	NPA 2010-09

SVFB/SAMA (franz.meier@svfb.ch) has placed **3** unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachments
195	(General Comments)	0	<p>Swiss Aircraft Maintenance Association (SAMA) (Schweizerischer Verband Flugtechnischer Betriebe) SVFB represents all companies involved in Aircraft Maintenance</p> <p>Preamble</p> <p>We very much appreciate the vision of the EU by introducing common laws to improve access to public air transport. We also have great respect for the effort undertaken in this matter by the agency and its dedicated and skilled staff. Our critical comments are not directed against this vision and not at all against the effort of the staff. Our critical comments are based on very serious concern. We are becoming aware that most of the very small and an increasing number of small businesses are closing down. What should make aviation safer and straightforward on the contrary makes it more complex and hardly understandable. The regulation code gets increasingly difficult to understand due to an unseen and never expected increase in volume. By this the code becomes unusable for the recreational, the private and the small business and difficult for bigger businesses. This concern is supported by individuals working within different NAA's stating that they feel helpless against this trend and are more and more unable to cope with it.</p> <p>General remarks:</p> <p>We support the comments made by „Aeroclub of Switzerland“ as detailed in their CRT. We will however not comment on specific paragraphs, as there is a multitude of comments doing so which are in many cases contradictory.</p> <p>Therefore we will give only general comments.</p> <p>In addition we like to present our own view concerning:</p> <p>1.The lower segment of the Aviation (small aircraft, small business, flying schools, sightseeing flights)</p>	

			<ul style="list-style-type: none"> • The code of law is too extensive and seems to rule every detail that <i>can be</i> regulated instead of regulating only what <i>must be</i> regulated • The definitions of commercial airtransport as well as of other commercial operators are embracing all kinds of very small and small businesses forcing an increasing number of them out of business • If ground transportation by cars, taxies and small buses would have to follow such heavy regulations, they would cease to exist <p>The potential risk and the accident behaviour in private ground traffic and small commercial ground traffic is comparable to recreational flying and functions with far less regulation and bureaucracy.</p> <p style="text-align: center;">2.CAT and other commercial operators</p> <p>This NPA gives the bigger companies more freedom of movement but also for this upper segment of aviation it becomes difficult to:</p> <ul style="list-style-type: none"> • read • understand • implement • follow 	
196	A. EXPLANATORY NOTE - IV. Content of the draft opinion/decision - Part two: Contracting by an operator involved in commercial air transport (CAT) of the Continuing Airworthiness Management of its aircraft	13 - 17	489. Option 0: do nothing. This is indeed a bad option for "real" CAT or "real" commercial operators, but the appropriate option for the lower segment of aviation. Again, as stated above it all depends on correctly setting the borderline of what really belongs to commercial operation which definitely is not the case in the entire EU and EASA regulation.	
197	A. EXPLANATORY NOTE - V. Regulatory Impact Assessment - PART A - Economic	21	All past experience has shown that the economic impact will not be significant, but will grow exponentially. There is a logic in this: the NAA claims it needed a high percentage of its additional staff to cover and handle the ever growing amount of legal code and the costs of EASA are coming on top of this.	

impact

Big organisations may handle it, for small organisations it is and will be a threat to the survival of their business.

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