

Basel, 21. April 2011

SVFB Swiss Aircraft Maintenance Association

P.O.B

4002 Basel

+41 79 334 61 70

franz.meier@svfb.ch

<http://www.svfb.ch/>

Mr. Patrick Goudou

Executive Director

European Aviation Safety Agency

Postfach 10 12 53

D-50452 Köln, Germany

By e mail

EASA Regulations for General Aviation Aircraft and Maintenance Organisations

Dear Mr. Goudou,

Please allow me to introduce myself.

I started in Aviation as a glider pilot 47 years ago, got up to the ATPL, have flown the MD 90 as an Airline Captain and acted as Manager Flight Operations. I also have 17 years of professional experience in maintenance of Public Air Transport Aircraft as head of a major maintenance organisation.

On February 15, 2004 I sent you a letter expressing my deepest concerns in respect of the General Aviation in Switzerland and in Europe. I was somewhat reassured by your answer.

Now retired as an Airline Pilot, I am back in maintenance as the Manager of SAMA. SAMA is the Swiss Aircraft Maintenance Organisation, representing 70 maintenance organisations mainly active in the General Aviation sector. About 50% of SAMA's members are small organisations with an average of 8 employees the other 50% medium to big organizations with several hundred employees. I was shocked when I heard the concerns of our members: the outcome of (EU-EASA) regulatory activities has far surpassed General Aviation's most pessimistic forebodings.

Here are some of the concerns of SAMA's members related to regulatory activities, from the perspective of General Aviation Maintenance Organisations:

- Due to the size and the number of revisions of the regulation, the workload involved in reading, understanding and implementing them is overwhelming for small to medium entities. The regulations are not proportional as they should be and as promised in many discussions. Furthermore they do not take into account the differences in complexity of the companies and their specific activities.
- Many small organisations are noticeably reluctant to comply as they feel the regulations are in no way adapted to the scope of their business.
- A consequence of this regulatory excess is a reduction and/ or renouncement of activities which have been previously done safely and professionally. Lots of smaller maintenance organisation owners reach such a degree of frustration that they consider giving up or have even done so. The risk is the loss of experience in this sector, which cannot be replaced by paper or rules. Who shall perform the maintenance work then?
- An example is given by a small Part M, Subpart F organisation which repaired damage on a single engine aircraft. This was done according AC 43 in the past. External engineering and endless documents are now needed with the same result on the aircraft repair itself, but with so much paperwork and administrative complexity that the repair takes four weeks longer and costs over one thousand Euros more. This organisation now hires a full-time person solely to deal with paperwork and administrative procedures, without any demonstrable increase in safety whatsoever.
- A further example is the small-part 145 MO, which has no problem covering Lear Jet Series TR in B2 staffs' license under its FAA approval. Why can't the same person sign off the same work under EASA approval? In the USA, an engineer can sign off any type with the AMP licence as long as he is approved by his MM organisation. Why are we in Europe not applying such a simple rule as well? The US airlines accident statistics does not show safety standards in the US that would raise concern in Europe. What kind of safety parameters could justify more constraints and costs in Europe, which are detrimental to the sector's competitiveness? The effect on General Aviation above 5.7 T is that some organisations tend to outsource heavy maintenance to non EASA countries to cut costs. The EU/EASA region is exporting jobs to non EU states.

- A flying club now needs to put its small private aircraft under CAMO supervision, which increases direct operational costs. Where is the safety benefit? Safety might even decrease if the maintenance staff spends a great part of their working time doing paperwork instead of mechanical practice.
- Where is the measurable gain in safety standards or efficiency in requiring the glider community to undergo specific training to apply for maintenance licences? Maintenance costs have increased significantly; did safety too?
- The duration and costs of tuition to become a licensed engineer also raise concerns. There is a lack of candidates for careers in the maintenance sector. The acquisition of type ratings and approvals in personal licences worked perfectly for the last decades but is now prohibitive and is leading to lack of qualified release personnel. Small organisations are pushed into taking short cuts. The sum of all module examination costs is more than tenfold to the pre-EASA cost level. Is there a demonstrable benefit in safety standards? The money spent in training activities in pre-EASA times directly benefited safety. Now, a lot of money goes into endless administrative procedures with authorities, CAMO'S and CAM's, for SMS's etc... but does not generate equivalent measurable benefits in safety. The need to hire the services of engineering offices, external CAMO's, Quality Assurance offices and consultants "helping" the industry to navigate through the regulatory processes is often felt as an unnecessary and expensive dilution of responsibility in processes that were handled before in a direct and responsible manner.
- NAAs' oversight activities have increased too, as have audits and enforcement activities. NAA's had to hire new staff due to the amount of work created by ever growing regulation. The costs for this accrued activity of national authorities have consequently increased with no proportionate and/or demonstrable increase in safety for GA.

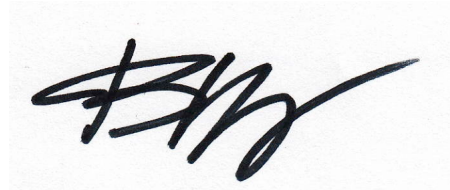
All in all and based upon these comments, I have to question the relationship between regulatory complexity, burden and costs on one hand, an improved safety in the General Aviation on the other hand. I do not deny good intentions in the work of EASA in this process and the latest news coming from Cologne allow some hope for light aircraft. But radical changes are needed: it is of paramount importance that the level of regulation regains proportionality, adapted to the relative low risks inherent in General Aviation.

SAMA's members expect resolute action to reverse over-regulation and therefore to downsize and adapt the regulatory material and activity to the proportionate level. Another goal is to allow a rule only where and when there is a demonstrated need of safety enhancement covering public interests. Sound Regulatory Impact Assessments should then to be conducted after implementation of the rules too, in order to allow corrective actions.

In this respect, I hope our concerns and those of many other stakeholders will allow inaugurating a new era of common understanding with EASA to protect the Aviation activities in Europe from bureaucratization.

Sincerely,

Franz Meier



Manager of SAMA
 Swiss Aircraft Maintenance Association
 Mobile: +41 79 334 61 70
 Landline: +41 44 586 79 31