



European Powered Flying Union

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Dear Readers

And greetings from hot Phuket! I have the honour to succeed René Meier in the function of the president of EPFU. Many thanks to all of you laying confidence in me. I shall do my best to deliver correct information on-time, good governance, best possible co-operation among us, remain in close contact with all other organisations supporting the activities of our community. I shall bear in mind that in the past years confrontation never has been successful, that only the will to co-operate, based on the clearly defined needs of the own constituency brought acceptable results. And VERY big thanks to René that he has promised to help me preparing future News Flashes and rulemaking tasks as otherwise contents would be considerably shorter.

Antti Kääriäinen



Third party request: Can we help them with some more information?

This is a message René received several weeks ago from our friend Jacques Cochelin of Fédération Française Aéronautique (FFA):

“In the Minimum Inspection Programme (MIP) (AMC M.A.302 (i)) an item provides for an "operational test" of the transponder at each visit (100 h / 1 year). Nowhere in the texts appears neither the explanation nor the content of this test. Our authority (DGAC) has recently modified a document defining the maintenance requirements of the on-board radio installation and the ATC chain in which it now imposes on all ELA 1 under EP (maintenance program) declared to perform this operational test at each visit.

Not making any distinction, in its application, between the traditional test as it is envisaged in the regulation and this operational test this is very penalizing. Indeed, an aeroclub performing under declared PE that performs 500 to 550 h / year with its ELA 1 must perform 5 to 6 tests / year / aircraft.”

My proposal: Please send your information on how this AMC text is dealt with in your country directly to Jacques Cochelin. He is particularly interested in answers covering the situation in the UK, in Germany, in Switzerland, and in Spain. His E-mail address: cochelin@free.fr

Many thanks for your supporting Fédération Française Aéronautique in this respect.



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Repetiton, slightly adjusted:

NPA 2018-13 Appendix I to AMC to Annex III (Part-66) - Aircraft type ratings for Part-66 aircraft maintenance licences (RMT.0541)

Just few days to go: EASA published NPA 2018-13 on 5/12/2018, it is indirectly important for our community as it affects maintenance licence holders. The **comment period ends on 5/3/2019**, as written in February already by René I do not intend to submit EPFU comments. For those interested in the subject: this is the "link" to the NPA:

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2018-13>

NPA 2018-14 Runway Safety (RMT.0703 and 0704, but also RMT.0296), a second evaluation

Remarks done till today as draft General Remark to be addressed to the Agency:

We at EPFU thank the Agency for preparing this NPA as there is nothing to say and write against reducing all sorts of ground-operations related incidents to a figure as near to "zero" as possible. But the means to achieve this, along with other means, by requiring a language proficiency near to "level 4" (it is mentioned nowhere in the text, but I think, reading between the lines, this is the idea behind) is in our eyes "mission impossible". That is, unless one invests a lot of time, money and effort to educate drivers which have never been chosen based on the language skills. As ICAO states, there are no shortcuts to obtain the skills required, simple phraseology will not cover the real needs, particularly not in case of incidents and accidents at aerodromes of all sizes.

NPA 2018-14 is not an ideal platform to prepare regulations for winter operations, e.g. in Norway (Alta, Båtsfjord, Honningsvåg, Kirkenes, Mosjøen, and Vadsø are mentioned). There is e.g. no direct link to the language proficiency aspects mentioned above, and, looking at the layouts of these airports, no direct comparison possible as regards the numbers of flights and the operational aspects. I propose to our Nordic members to carefully evaluate the case study "The Norwegian shortfield regional aerodromes network" on pages 198-199. May I invite you to send me comments on the Agency's positive and/or negative impacts presented within the evaluation framework applied? Negative surprises should be avoided, and it is learned already admittedly many years ago, that it is the pilot in command, who is responsible for the safe operation of the aircraft. Could national solutions be a better option for these very special sort of operations?

Mixing operations-related and training-related aspects is not a good idea. Including in an NPA requirements applicable to the largest European airports and at same time such applicable to small one's like Båtsfjord (RWY 800 m), Førde (RWY 800 m), Hammerfest (RWY 882 m), and Honningsvåg (RWY 882 m) might not be appropriate.

Besides all this: Congratulations to the Norwegian CAA for the bright yellow RWY/TWY/Apron markings we see e.g. at Førde. This really is a risk-based solution adjusted to harsh winter conditions. "Ready to copy?"

European Action Plans for the Prevention of Runway Incursions and Excursions (EAPPRI, EAPPRE) themes, control of pedestrians at the aerodromes (at night?), the introduction of new requirements for runway surface condition assessment and reporting, aerodrome snow plan, aerodrome maintenance, aircraft towing and Foreign Object Debris (FOD) control programme, performance standards for runway surface friction measurement devices as well as certain changes to existing requirements related to surface movement guidance and control systems (SMGCS) and other operational activities are also proposed.



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Finally, the new requirements for runway surface condition assessment and reporting are aligned with the outcome of RMT.0296 'Review of aeroplane performance requirements for commercial air transport operations'.

All this in one NPA? That is too much we think. **Comment period ends on 18/3/2019**, this is the "link" to the NPA:

<https://www.easa.europa.eu/sites/default/files/dfu/NPA%202018-14.pdf>

NPA 2018-15 Rescue and firefighting services at aerodromes (RMT.0589)

This is the "link" to the NPA:

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2018-15>

Comment period ends on 18/3/2019. Remarks as per today: With this NPA the Agency wishes to support a level playing field for those involved in rescue and fire fighting operations at aerodromes. On page 4/48 the Agency writes "...that there are indeed are national regulations or policies that establish medical and physical fitness requirements..." and on page 6/48 we read that "EASA is not aware of any occurrence where the medical and physical fitness...had an impact on the execution of their duties."

Just above this the Agency writes: "EASA had concluded that personnel involved in the operations of aerodromes must be subject to common safety requirements, and therefore some medical and physical fitness requirements for rescue and firefighting personnel were included in Annex Va of Basic Regulation 216/2008.

According to my understanding "common safety requirements" do not have much in common with "medical and physical fitness requirements". On the other hand the list presented on page 7/48 does not contain "mental fitness", which, in my opinion, should also play high role, but within the text we find a chapter named "psychiatry", a too strong term in my opinion.

In the end, the conclusion of the Agency is to propose as an preferred oprion; **Option 1 (provide guidance)** provides an overall positive safety impact without the need to change the current national regulations or policies, allowing aerodrome operators to focus on areas not covered by the national regulation or policies. This we should support.

NPA 2019-01 Aircraft Cyber Security (RMT.0648)

NPA 2019-01, published on 22/2/2019, tries to mitigate potential cybersecurity threats on safety. Such threats could be consequence of intentional, unauthorised acts of interference with aircraft on-board electronic networks and systems. It proposes amendments to CS-23, CS-25, CS-27, CS-29, CS-E, CS-ETSO, CS-P, and, as applicable to their related acceptable means of compliance (AMC)/guidance material (GM), together with AMC-20. The amendments would introduce cybersecurity provisions into the relevant certification specifications (CSs), taking into account the existing special conditions (SCs) and the recommendations of the Aviation Rulemaking Advisory Committee (ARAC) regarding aircraft systems information security/protection (ASISP). **Comment period ends on 22/5/2019.** In my opinion we should comment so that we get a balanced provisions that covers our needsand avoids a simple breaking down of e.g. CS-25 rules to the CS-23 level, or the ones for CS-29 to CS-27 when it comes to rotorcraft. For your own comments this is the "link" to the NPA:

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2019-01>



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Comment Response Documents (CRD), Opinions, Agency Decisions, and Public Consultations , of February, in bold characters texts important for us:

- CRD's:
- 22/02/2019, **CRD 2017-03, In-flight recording for light aircraft (NPA 2017-03, RMT.0271-0272).**
 - 22/02/2019, CRD 2016-11, Review of aeroplane performance requirements for commercial air transport operations (NPA 2016-11, RMT.0296).
 - 22/02/2019, **CRD 2017-15, Non-ETOPS operations using performance class A aeroplanes with a maximum operational passenger seating configuration of 19 or less (NPA 2017-15, RMT.0695).**
 - 19/02/2019, **CRD 2017-21, Remote aerodrome air traffic services (NPA 2017-21, RMT.0624).**
 - 19/02/2019, **CRD 2016-14, Easier access for general aviation pilots to instrument flight rules flying (NPA 2016-14, RMT.0677).**
- Opinions:
- 22/02/2019, **Opinion 02/2019, Amendments to Regulation (EU) No 965/2012 as regards requirements for aeroplane performance, alternate power supply for CVRs, in-flight recording for light aircraft & non-ETOPS operations with performance class A aeroplanes with MOPSC of 19 or less.**
 - 19/02/2019, **Opinion No 01/2019 (A) & (B), Easier access for GA pilots to IFR flying (RMT.0677) & Revision of the balloon (RMT.0654) and sailplane licensing requirements (RMT.0701).**
- Agency Decisions:
- 19/02/2019, **Remote aerodrome air traffic services**, ED Decision 2019/004/R.
 - 13/02/2019, AMC & GM to Part 21 — Issue 2, Amendment 8 ED Decision 2019/003/R
- Public Consultations: None for us.

BREXIT “links”, a repetition with some new last lines

As you most probably know the UK House of Commons rejected the BREXIT deal on 15 January. “Brexit preparedness notices” aiming at preparing citizens and stakeholders for the withdrawal of the United Kingdom have been prepared in a wide range of policy areas. Here are “links” to aviation-relevant texts:

https://ec.europa.eu/info/sites/info/files/file_import/air_transport_en.pdf

https://ec.europa.eu/info/sites/info/files/notice_to_stakeholders_brexit_aviation_safety_rev1_final.pdf

https://eur-lex.europa.eu/resource.html?uri=cellar:f1d02127-044e-11e9-adde-01aa75ed71a1.0001.02/DOC_1&format=PDF

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52018PC0894>

Please let me know if additional information could help. This is the “link” to the list covering all areas:

https://ec.europa.eu/info/brexit/brexit-preparedness/preparedness-notices_en



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Nearly everyday news on this topics are published and just when writing this, BBC is broadcasting related news. In order to keep you up to date I integrate below another "link" leading you a highly reliable, trusted and well known source:

<https://www.flightglobal.com/news/>

Basic Regulation 2018/1139 E-learning available, a short repetition:

This is the "link" for your individual training:

<https://www.easa.europa.eu/newsroom-and-events/news/new-e-learning-course-easa%E2%80%99s-new-basic-regulation-regulation-eu-20181139>

COMMISSION IMPLEMENTING REGULATION (EU) 2019/317

laying down a performance and charging scheme in the single European sky and repealing Implementing Regulations (EU) No 390/2013 and (EU) No 391/2013 (11/2/2019)

(Text with EEA relevance) Brand new! This is the "link" to the full text:

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0317&from=EN>

Most important for us: Article 31 **Calculation of charges:**

1. The *en route* charge for a given flight in a given *en route* charging zone shall be equal to the product of the unit rate established for that *en route* charging zone and the *en route* service units for that flight.

2. The terminal charge for a given flight in a given terminal charging zone shall be equal to the product of the unit rate established for that terminal charging zone and the terminal service units for that flight. For the purpose of calculating the terminal charge, the approach and departure of a flight shall count as a single flight. The unit to be counted shall be either the arriving or the departing flight.

3. **Member States shall exempt** the following flights from *en route* charges:

(a) **flights performed by aircraft with a maximum authorised take-off weight which is less than two metric tons;**

(b) mixed VFR/IFR flights in the charging zones where they are performed exclusively under VFR and where an *en route* charge is not levied for VFR flights;

(c) flights performed exclusively for the purpose of transport, on official mission, of reigning Monarchs and their immediate family, heads of state, heads of government and government ministers, where it is substantiated by the appropriate status indicator or remark on the flight plan that the flight is performed exclusively for that purpose;

(d) search and rescue flights authorised by the appropriate competent body.

4. **Member States may exempt** the following flights from *en route* charges:

(a) military flights performed by aircraft of a Member State or any third country;

(b) training flights performed solely within the airspace of the Member State concerned and exclusively for the purpose of obtaining a licence, or a rating in the case of cockpit flight crew, where it is substantiated by an appropriate remark on the flight plan that the flight is performed exclusively for that purpose;

(c) flights performed exclusively for the purpose of checking or testing equipment used or intended to be



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used as ground aids to air navigation, excluding positioning flights by the aircraft concerned;

(d) flights terminating at the airport from which the aircraft has taken off and during which no intermediate landing has been made;

(e) VFR flights;

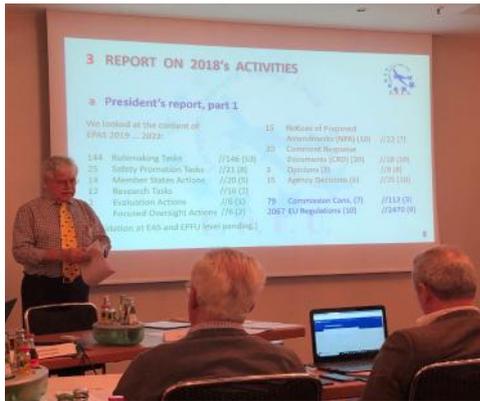
(f) humanitarian flights authorised by the appropriate competent body;

(g) customs and police flights.

5. Member States may exempt from terminal charges the flights referred to in paragraphs 3 and 4.

6. Member States shall cover the costs for the services that air navigation service providers have provided to flights exempted from *en route* charges or terminal charges in accordance with paragraph 3, 4 or 5.

Not so serious pictures (at least some of them) from the Munich 2019 AGM of EPFU



The outgoing president declaring what he did in 2018
(Thanks to Henry Lindholm for the picture)



After election party in the dark, not yet full attendance. Title of the song as background music: "Don't bring me down!"
(Picture by Alexandra Desrousseaux)



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The Nymphenburg Castle...
...the new EPFU Headquarters?
(Picture by Renata Schreiber)



There are first ongoing discussions as regards the headquarters question. Many thanks to Pit Schoeffler for this beautiful city tour!
Picture by Renata Schreiber)

Bad news

EPFU website hacked just before our Annual General Meeting

Our newly adjusted website has been hacked just before our Munich Annual General Meeting. So work is again in progress. The involved persons do their best to correct the situation as quickly as possible.

Good news, to be confirmed...

After the EASA Committee Meeting this week

we heard that **Part-ML passed** with some changes, but mainly on transitional provisions. Also [in defect repairs] the “possible” has been changed to “practicable” as requested by Europe Air Sports (EAS). The application date was moved 6 months and EASA will create a group to work on AMC/GM. Also **Modular LAPL was adopted** today and we had the **first discussion on Basic instrument rating** and sailplanes/balloons licensing books. The EPFU News Flash Team will check the information.

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Kind regards,

Antti Kääriäinen, President
FI-16900 Lammi, 1 March 2019

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