



EUROPEAN GLIDING UNION

Representative Organisation of European Glider Pilots

Paris, 24 January 2005

To: Air Eurosafe

Re: Comments to RIA Part M

Dear Sirs,

Please find attached, the answers to the RIA Questionnaire on Part M from the European Gliding Union, which represents the National Gliding Bodies (Federations or National Aero Clubs) of 16 European countries: Austria, Belgium, Czechia, Denmark, Finland, France, Germany, Italy, Ireland, The Netherlands, Norway, Slovakia, Slovenia, Sweden, Switzerland and United Kingdom. These National Gliding Bodies account for 80, 000 glider pilots, operating 18, 000 sailplanes and powered sailplanes.

We have done our best to answer the questionnaire. Some of the questions are not very clear and we have concerns about many other issues, some of which have been raised in the detailed response made by Europe Air Sports to the first consultation paper (1/2003–06–02 regarding maintenance regulation).

First of all, we feel strongly that this regulation is much too complex for simple aircraft like sailplanes and powered sailplanes. It has obviously been written for large-scale commercial aviation and the views of gliding and sport aviation in general were not considered when the scope of applicability of these rules was first made by proposals of the European Commission and enactment by the European Parliament.

The Part M measures do not take into account the situation that has existed in most European countries for more than 50 years, where the national policies have encouraged delegation from National Airworthiness Authorities to the National Gliding Bodies (NGB). The attached “How it’s done” document shows that sailplanes, powered sailplanes and tow planes are mostly maintained in the framework of clubs, generally by inspectors trained and licensed by the NGB. Quality control is ensured by audits performed by a technical staff appointed by the NGB. In the UK, the maintenance of gliders is, in fact, totally deregulated.

NAA scrutiny has invariably found that NGBs are fully capable of ensuring air safety, as demonstrated by accident/incident rates which compare favourably with, and often exceed, those where stricter legislation is applied.

Additionally, these maintenance procedures, which are mainly based on voluntary work, are cost effective, and administratively not too burdensome.

The implementation of the current Part M to gliding would oblige all existing organisations to apply to become Subpart F or G organisations. This would clearly lead to a huge increase of the bureaucratic workload of the voluntary staff in air sports organisations without achieving safety gains.

Furthermore, the existing Part M relies on the availability of Part 66 licensed staff for issuing various certificates. Since there are very few people in gliding licensed to such a high level, the gliding organisations would have to recruit Part 66 licensed engineers. Even if the associated costs are very difficult to estimate at the present stage, it is obvious that this would make sailplane maintenance dramatically more expensive.

We would remind you that the financial aspects are particularly important for air sports because leisure pilots pay their own flying costs and any rule that increases the costs will result in pilots flying less (which will, in fact, have an adverse effect on safety) or giving up flying (which will be detrimental to our sport and to personal freedom and choice and limit the social groups who can afford our activity).

For all these reasons, the current Part M is clearly unacceptable for the European Gliding movement. As there is obviously no safety case, the EGU requires this regulation to be thoroughly modified in order to allow the maintenance of sailplanes and powered sailplanes to be done in a much more pragmatic and cost effective way. In our opinion, this can only be achieved by taking into account the existing solutions which have proven to work satisfactorily for many years.

As already mentioned in the past, we are willing to assist the bodies/rulemakers involved by offering our expertise and experience towards working out a solution satisfactory to all parties.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stuck', with a stylized flourish at the end.

Roland Stuck
EGU President