



EUROPE AIR SPORTS

The Association representing National Aero Clubs and European Air Sports Organizations in Regulatory Matters with European Authorities and Institutions.

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20th June 2005

Roberto Salvarani
Head of Environment and Air Safety
Directorate-General for Energy and Transport
European Commission
Brussels

Dear Sir,

PROPOSED AMENDMENTS TO REGULATION 1592/2002 (AVIATION SAFETY)

Earlier this year the European Aviation Safety Agency submitted proposed changes to Regulation 1592/2002 to the Commission. These proposals embraced revisions to Annex II to the Regulation, covering exemptions for the Regulation, and which, we understand, are under consideration by the Commission at the present time.

On 13th May Mr Louis Berger, a Board member of Europe Air Sports (EAS), met with you and briefed you with regard to Annex II and some matters which EAS would wish the Commission to consider. It was agreed at that meeting that EAS would submit proposals to the Commission following an EAS board meeting on 11th June at which the various inputs from EAS members were to be considered. Following that board meeting we are now writing to you to submit our proposals.

The proposals take into account the EASA proposals submitted earlier this year, as well as the original Annex II. The proposals cover six distinct aspects.

1. The weight thresholds for exemption from the Regulation for gliders and / or sailplanes, in relation to the weight thresholds for exemption of aeroplanes as incorporated in the current Annex II.
2. Modification of the EASA draft amendment to cater for weight allowances for amphibian aeroplanes / helicopters and for weight allowances for airframe mounted total recovery parachute systems.
3. Modification of the criteria of 'complexity' for historic aircraft.
4. Modification of the age criteria for historic aircraft
5. Additional criteria (2) for what constitutes a replica aircraft
6. Consistency of phraseology

The enclosed papers in support of these proposals are:

1. Annex A - a brief explanation of each proposal above
2. Annex C - a diagrammatic representation of the first proposal



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3. Annex B - a comparison of the proposed wording from EAS of an amended Annex II, compared with the EASA wording as submitted by EASA to the Commission earlier this year, and, as a summary, EAS's proposed revised text of Annex II to Regulation 1592/2002

We would emphasise that each proposal stands in its own right, and we would recommend that if for any reasons any one proposal should not meet with acceptance by the Commission, then that should not affect the validity of the other proposals.

The proposals have been arrived at through extensive consultation with our member organisations, which are the National Aero Clubs of EU countries (and other countries in ECAC), and the pan-European Unions representing the interests of different sectors of the air sports community of pilots and owners.

Should it be necessary, one of our Board members, or our Programme Manager, Mr Rudi Schuegraf, is prepared to meet with you and any other officials at short notice to discuss these proposals further.

We thank the Commission in advance for consideration of these proposals, and for the courtesy you extended to Mr Berger on 13th May.

We have copied Mr Probst, Rulemaking Director at EASA, as we understand that the Commission will want to seek his advice on our proposals.

Yours faithfully,
For Europe Air Sports

Sir John Allison
President

c.c. M. Claude Probst, EASA