



Welcome to the November 2011 enews of IAOPA Europe, which goes out to 23,000 aircraft owners and pilots in 27 countries across the continent

### Work starts to fix Part M

An EASA working group is to be set up to look at the whole question of Part M, EASA's maintenance requirements for general aviation, which has been universally condemned as too prescriptive, too bureaucratic, too costly and difficult to understand. An EASA Part M workshop in Köln on October 27th heard a universal chorus of negativity about the maintenance programme, which was said to have caused great upheaval without addressing any known safety issue. IAOPA was represented by Dan Åkerman of AOPA Sweden, Raynir Gudmundsson of AOPA Iceland, and George Done, Chairman of AOPA UK, and they were among 200 delegates - far more than had been expected. Representatives from industry were joined by staff from 21 European CAAs and 14 staff from EASA, and at the end EASA were left with no illusions that Part M was seen as a heavy and unnecessary burden on general aviation, and that action was needed to repair the damage.

George Done and Dan Åkerman gave a presentation on how Part M had affected aircraft owners and pilots across Europe, while groups representing maintainers, business aviation, manufacturers, glider pilots and others weighed in with exactly the same message - Part M isn't working. Afterwards George Done said: "People put their case with varying degrees of forcefulness, but with speaker after speaker, the message was the same; Part M was ill-conceived, badly written and overly complex, and from a safety standpoint it was not justified - aircraft were not having accidents because of poor maintenance under the old system."

EASA's Deputy Head of Rulemaking Eric Sivel said the intention had been good and intimated that some of the problems with Part M stemmed from each state's interpretation rather than from the rules themselves. This analysis found little favour with the industry representatives, who strongly supported a proposal for an EASA working group be set up as a matter of urgency. It is hoped it can begin its work before Christmas.

George Done said: "If it works out, the level of complexity will be as it was before Part M. It was stressed again and again that there was nothing wrong with the old system, and the need for such major change in order to achieve the EASA objective of standardisation was never established."

IAOPA's job now is to ensure that the working group produces concrete results. EASA has in the past made promises that the problems of Part M would be addressed, notably with the establishment of a 'Part M lite' for general aviation, but nothing meaningful has come of it. Given the strength of feeling exhibited by the industry at the workshop, action must be taken to alleviate the burden.

## IAOPA works to de-snag EASA-OPS

IAOPA-Europe has joined with AOPA-US to try to turn back a proposed EASA rule which would force pilots to descend into cloud in mountainous terrain if they were not carrying oxygen. EASA has published proposals requiring pilots flying between 10,000 and 13,000 feet to descend below 10,000 feet after 30 minutes. IAOPA believes that this rule would introduce a serious safety hazard in order to address a safety problem which doesn't exist, and data from AOPA-US proves the point.

The rule is contained in EASA's Notice of Proposed Amendment on Non-Commercial Operations, to which IAOPA has responded with a sheaf of requests for amelioration, exemption or wording changes. The most urgent is this oxygen requirement, which IAOPA says should be changed from an absolute rule to guidance for pilots. In its response on behalf of IAOPA, Jacob Pedersen of AOPA-Denmark says: 'IAOPA Europe has with assistance from AOPA US studied all accidents in the period 1991-2010 where the NTSB has listed hypoxia as a contributing factor. Of all these accidents none involve flights in the 10-13,000 ft. window. All reported accidents relate to aircraft operated above 14,000 ft. Looking at US data is particularly interesting since the FAA does not mandate supplementary oxygen for operations below 12,500 ft. As evidenced by the accident statistics this has not caused accidents for the cruising altitudes where EASA is now proposing to mandate oxygen.' Figures for Germany, where oxygen is not mandated below FL120, are similar.

IAOPA is also seeking changes to EASA's non-commercial operations proposals because the rules have been written for airlines and should not apply to GA. For example, it is seeking more flexibility in regulations on the carriage of dangerous goods, which would make it impossible to carry a can of de-icing fluid, a camping gas cylinder or a spare oxygen bottle on board without special permission, while allowing the carriage of perfume for on-board sale. IAOPA also makes the point that expecting every GA pilot to read and understand the 1,000-page ICAO manual on dangerous goods, 99 percent of which is irrelevant to GA, is unreasonable.

IAOPA wants a rethink of EASA's proposal to remove a traditional dispensation for aerobatic aircraft not to have to carry fire extinguishers; an extinguisher that breaks loose during violent aerobatics is a significant hazard. Among other requested changes, IAOPA proposes that persons taxiing aircraft should not have to be qualified to use RT at airfields with no radio; use of aeronautical charts should not be mandated because they may not exist; more than doubling the RVR minima for non-commercial flights is unwarranted; pitot heat should not be mandated for night flight because there is no demonstrated safety need and retrofitting is impossible for many aircraft. Requiring non-commercial operators to produce a Minimum Equipment List for each aircraft and have it approved by the Authority is unjustified if a master list exists for the type; and pilots should be allowed to use publicly-approved airports without separately having to satisfy themselves that they conform to every regulation. On the positive side, EASA has abandoned the proposal to require all aircraft to carry fixed ELTs and will allow Personal Locator Beacons in their place.

The full IAOPA response is carried on the [IAOPA-Europe website](#).



## Bad language

Faulty translation of documents is causing significant problems across Europe, and now has the potential to significantly delay implementation of EASA-FCL in Germany. There are several questionable translations in the German text of EASA-FCL, but the problem is made worse by the fact that all languages are treated equally, and every translation is passed as law by the European Parliament. This means that while everyone knows that Europe's and EASA's working language is English, the English text is not regarded as the correct one and it is not possible to refer to any 'original' document to cross-check translations.

A glaring example of inaccurate translation has been highlighted in the German text of FCL.510.A, which reads in part: (b) Erfahrung. Bewerber um eine ATPL(A) müssen mindestens 1500 Stunden Flugunterricht in Flugzeugen absolviert haben; der Unterricht muss mindestens Folgendes einschließen:

The equivalent English version reads:

(b) Experience. Applicants for an ATPL(A) shall have completed a minimum of 1500 hours of flight time in aeroplanes, including at least:

The difference is stark. The English text requires experience of 1500 hours of flight time in aeroplanes, but the German text requires 1500 hours of 'Flugunterricht' or flight instruction.

Given that no language has primacy, it is impossible to say which is correct, and the problem arises of how to legally change the text to reflect EASA's intentions. The German Department of Transport has so far been unable to tell AOPA-Germany how to solve the problem.



## A holiday in Elba next year?

In the July issue of the IAOPA-Europe enews we reported that airport fees on the Italian island of Elba had been increased by 600 percent, and that as part of its campaign against these unjustified increases AOPA Italy was asking European pilots to boycott the island. Massimo Levy of AOPA Italy reports that the boycott has had the desired effect. He writes:

"We appealed to all European pilots not to fly to Elba for the current season. The response was outstanding: the traffic reduction was immediate and heavy - so heavy that, at the beginning of August the Board of Directors removed the airport manager and nominated a new one. But by the time the new manager arrived and understood the situation, the summer season was gone, and lost.

"Finally, at the beginning of September, AOPA Italy, invited by the Hotel Operators Association, met with the new manager. The result of the meeting are very interesting:

- the airport parking fees will return as of Jan 1 2012 to the 2010 level (for everybody)
- the airport will create a sort of "frequent user" card with discounts for multiple visits
- all European AOPA members showing a valid "crew card" will enjoy an additional 20% discount on both handling and parking fees
- all European AOPA members arriving with 5 airplanes or more will enjoy an additional discount.
- AOPA Italy, on behalf of IAOPA Europe, will sign a letter of intent with the Elba Hotel Operator Association, who will create an "Elba card" for arriving pilots. This card will grant discounts and additional facilities for visiting members. A European fly-in will be organised for 2012. More details will be published when they are available."

Many congratulations to AOPA-Italy for a successful conclusion to its campaign.

## AOPA-Italy wins action on English Language Proficiency

More good news from Italy on the ICAO Language Proficiency examination. On October 18th the Italian CAA released the certification for an alternative 'English language proficiency test' for PPLs. After years of discussions, some of it harsh, AOPA-Italy has been able to break the monopoly of a private foreign corporation appointed exclusively to administer ICAO language proficiency tests. This company had a vested interest in making sure that it maintained its customer base by making the test very difficult, thus ensuring that no-one achieved the highest level of qualification, which never needs to be renewed. A new test, available through AOPA-Italy has been tailored to fit the needs of a VFR

pilot, rather than those of a professional pilot. Massimo Levy says: "We sincerely hope it will allow Italians to fly safely outside our borders with the necessary knowledge of the English language."

### **And even more good news from Italy...**

As we announced in the IAOPA Europe enews a few months ago, the Milano Linate CTR shrank, effective from October 20th, by ten miles - five to the north, five to the south. Details of the new CTR were presented to all flight schools and flying clubs who wanted to attend during a joint presentation by AOPA-Italy and ENAV, the Italian Air Traffic Control company. At the end of the presentation ENAV announced that more controlled airspace will be revised in the future with the co-operation of AOPA Italy.

### **Avionics company wants your opinion - chance to win €150**

An avionics company is asking IAOPA's Europe members for their thoughts on products for the general aviation market, and there's a draw for a €150 voucher as an incentive to complete the survey. The survey takes less than ten minutes to complete and closes on November 12th, so if you want a chance to win, click on the link below. The €150 will come in the form of an Amazon gift card. No personal data is required, and your anonymity is preserved. If you want to take part, click on [this link](#)

### **World Assembly in South Africa next April**

Next year IAOPA is celebrating its 50th anniversary, and there will be a special celebration in South Africa to mark this seminal event. The 26th IAOPA World Assembly takes place Cape Town between April 10th and 15th 2012, and early-booking discounts are still available to delegates. The World Assembly, held every two years, is an opportunity for the 69 AOPAs around the world to get together to discuss a common approach to the problems facing general aviation. Airport and airspace access, security, user fees and the environment are the major issues scheduled for debate at this important forum, and experts on each topic will address the Assembly. At the end of the conference, which takes place at the Spier Hotel in Stellenbosch, there will be an opportunity to visit Stellenbosch Flying Club, where flights over the Cape area can be arranged in fixed-wing aircraft and gyrocopters. AOPA South Africa has also arranged with local travel experts to create bespoke tours for delegates who wish to spend longer in South Africa. For full details and registration information see [www.iaopa2012.co.za](http://www.iaopa2012.co.za)