



European Powered Flying Union

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Dear Readers

After some very cold and windy days here spring is on long final, so flying, and other outdoor activities, will become more pleasant.

Springtime also is the period of nearly all annual general meetings/assemblies. EPFU's one was held at the begin of February at Paris. Many thanks to all of Fédération française aéronautique contributing to this well-prepared event, particularly for the flexibility shown: we did not have the Eiffel Tower as a picture on several publications, we where there...



Merci beaucoup!

European Powered Flying Union's Annual General Meeting, 2 – 4 February 2018, Paris, France, an overview

Prepared by Fédération française aéronautique (FFA) we met at the Ibis Hotel Paris Clichy-Batignolles for a welcome drink on 2 February already, held a board meeting in the morning of Saturday and started the Annual General Meeting at 14.00 h in the afternoon. A warm welcome was given to Henry Lindholm, the first president of EPFU, to Max de Richemond, first secretary general, but also to Michel Lévy of Direction générale de l'aviation civile, the keynote speaker of the event, to Christian Sinet of FFA, and to Jean-Pierre Delmas of Europe Air Sports (EAS).

As president I gave an overview of the past year explaining in a few words the significance of these figures: We looked at the content of the newly structured European Plan for Aviation Safety (EPAS) 2018...2022, the figures in brackets indicate the number of tasks or texts important to us:

146	Rulemaking Tasks (53)
21	Safety Promotion Tasks (8)
20	Member States Actions (5)
16	Research Tasks (2)
6	Evaluation Actions (1)
6	Focused Oversight Actions (2)

The Agency published in 2017:

22	Notices of Proposed Amendments (NPA) (7)
18	Comment Response Documents (CRD) (10)
9	Opinions (8)
25	Decisions (10)

What are we waiting for? Part-M light (RMT.0547), B2L and L Licences (RMT.0135), Technical Records (RMT.0276) are suffering too long delays hindering our activities, as does the no longer existing clarity as regards acceptance of hours flown on «Annex II» aircraft their the acceptance for training purposes. Future threats may be a reduction of airspace available to us due to increased operations of drones, particularly by the one's of the open and the specific category, and compulsory electronic conspicuity for all airspace users due to fact mentioned above.



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Manfred Kunschitz, treasurer and founder member presented a financially healthy balance sheet, this was confirmed by the auditors Knud Nielsen and Bjoern Skogoe. Prospects are good as well for the years to come.

This year we had to re-elect the vice-president, the treasurer, a board member. So here are the members of the EPFU-Board and their tasks to be fulfilled until the next AGM of 2019:

René Meier (Switzerland), President
Jean Birgen (Luxembourg), Vice-President
Xavier Barral (France), Secretary General
Manfred Kunschitz (Austria) Treasurer
Marc-André Heurtevant (France), Communications

Knud Nielsen (Denmark) and Bjoern Skogoe (Norway) were re-elected to continue to act as auditors.

After the statutory part Michel Lévy of DGAC gave us an overview of the introduction of the “Declared Training Organisation” in France. It contained many hints as regards what to consider particularly when starting the transformation process in the own country.

I had the pleasure to present some pictures of the “smartflyer challenge 2017” held at Grenchen (LSZG), visited by Mr. Jean-Luc Charron, FFA’s president, accompanied by Xavier Barral. “Burning flames” were then presented to the audience by Ernest Mattiussi representing Fédération aéronautique luxembourgeoise (FAL). With a short video sequence Ernest reminded us of the fact that extinguishing electric fires still is a problem because of a lack of equipment, but I think by not yet adequate instruction and training as well.

We were invited by FFA to have dinner at the Eiffel Tower’s Restaurant, a first class venue offering top-quality food and drinks. The original plan was to have dinner on a boat on the Seine River. The rivers level, however, was so high that no boats could circulate. Many thanks to François Roy for this departure alternate at a safe level.

The 2019 EPFU AGM will be held early in the year in Munich, Pit Schoeffler (DAeC Motorflug) already is at the controls.

NPA 2017-19 Installation of parts and appliances that are released without an EASA Form 1 or equivalent (RMT.0018)

is still open for consultation on the EASA website. This is the «link»:

<http://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2017-19>

I distributed a few days ago my 25 provisional comments to many of you. Please let me know if I have forgotten something or if you would like to get a copy of your own. The deadline for submission of comments is **14 Mar 2018**. What arrives until midnight of 13 March 2018 will be integrated.

NPA 2017-20 Embodiment of Level of Involvement in AMC/GM of Part-21 (RMT.0262, formerly MDM.060) Repetition

was published on 15 December 2017, comment period will end on 15 March 2018. No rulemaking group was established, the texts are based on Opinion 07/2016, resulting from NPA/CRD 2015-03, not commented by me. It is a manufacturer-centric NPA. This is the «link» to the text:



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<http://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2017-20>

Part-21 not being our core-business. After consulting specialist in the field covered by this RMT I decided to do nothing. Please let me know if you disagree, this will not change.

NPA 2017-21 «Technical and operational requirements for remote tower operations» [RMT.0624 (PHASE 2)]

was published on 20 December 2017. Comment period will end on **3 April 2018**. The «link» is:

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2017-21>

As by the time the comment period ends I shall no longer be Europe Air Sports' Programme Manager I shall submit what follows as "EPFU own" comments:

- 1) Why does the Agency use so many times "should" when ICAO uses "shall" addressing the same topic?
- 2) Replacing the "should" used by the dozens by "shall/has to/must..." would create a more convincing background for future Regulations and Decisions containing Acceptable Means of Compliance (AMC) and Guidance Material (GM).
- 3) The importance of best possible weather information is recognised, however, the wordings chosen are in several cases not convincing. (AutoMETAR e.g. only partially delivers what really is required for safe operations in all conditions.)
- 4) In quite many cases addressing "flight crews" instead of "aircraft" would enhance reading and understanding.
- 5) To me it is not acceptable that "multiple mode" remote tower operations may provoke delays. In my eyes "multiple mode" operations only are helpful when truly low density aerodromes operations will be combined with no simultaneous traffic peaks and, to the extent of the possible, similar procedures and traffic patterns in place.
- 6) It must be made clear somewhere in the future regulation that we will not accept closing airports for VFR traffic supervised by remote towers in case of for us irrelevant systems degradations. More precise procedural considerations are needed.
- 7) New/adjusted radiotelephony procedures must be introduced to avoid confusion when "multiple mode" is in operation, useful proposals are missing, just adding a letter or a figure as suffix is not reliable enough as we apply Guglielmo Marconi's technology.
- 8) Some role description need clarification.
- 9) I did not find any paragraph as regards "drones".

Your comments on this are highly welcome.

NPA 2017-22 Updating Part-MED and related AMC and GM, RMT.0287(b) (MED.001)

was published on 21 December 2017. Comment period ends on 21 March 2018. The "link":

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2017-22>

Work is still in progress at medical advisor level, if the situations requires to do so I shall send you an intermediat information.



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NPA 2017-05 (A)(B) Introduction of a regulatory framework for the operation of drones — Unmanned aircraft system operations in the open and specific category (RMT.0230)

Unfortunately, the Comment Response Document (CRD) is yet to be published, it is therefore too early for comment, but I shall keep you informed as quickly as possible.

NPA 2018-01 Instructions for continued airworthiness [RMT.0252 (MDM.056)]

was published by the Agency on 29 January 2018, **comment period will end on 30 April 2018**. In the Executive Summary the Agency writes: «The objective of this NPA is to mitigate the risks linked to the uncertainty of the status of instructions for continued airworthiness (ICA) and therefore **to avoid there being too much room for interpretation in the rules and standards, leading to differences and possible safety risks**. This NPA proposes to amend Annex I (Part 21) of Regulation (EU) No 748/2012 **to clarify that ICA are part of the type certificate (TC), and to develop the related acceptable means of compliance (AMC) and guidance material (GM)**. It also merges the requirements related to record keeping, manuals and ICA in the various subparts into a single requirement for each of these aspects in Subpart A (new points 21.A.5, 6 and 7).

The proposed changes are expected to improve the harmonisation of ICA among the design approval holders (DAHs) in relation to the identification, approval, formatting and availability of ICA to the end users.»

Unfortunately no conclusion yet, more work is required. I am still of the opinion that this is, as many say, one more step away from the «simpler, lighter, better» idea, put on hold by the EPAS 2018...2022, it is not in-line with the General Aviation Roadmap and it does not bring what we urgently need to develop sports and recreational aviation. The „link“ to the NPA is

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2018-01>

NPA 2018-02 Provisions of airworthiness requirements in support of global performance-based navigation operations (RMT.0519)

On 22 February 2018 the Agency published this NPA, with a **comment period ending on 30 April 2018**, we therefore only have a bit more than 2 months for commenting on this topic also important for our community, adjusted provisions will be in place for us. The high technicality of the contents of this NPA require a further reading before proposing future comments. This is the “link” to the document:

<https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2018-02>

Comment Response Documents (CRD), Opinions, Agency Decisions published last month

CRD's published: **CRD 2016-03 (A)...(F)** Technical review of the theoretical knowledge syllabi, learning objectives, and examination procedures for air transport pilot licence, multi-crew pilot licence, commercial pilot licence, and instrument ratings, on 8 February 2018.

CRD 2017-08 Regular update of CS-ETSO, on 19 February 2018



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Agency Decisions: AMCs & GM to **Part-FCL and Part-ORA of Commission Regulation (EU) No 1178/2011**, as amended, as regards the theoretical knowledge syllabi and learning objectives for ATPL, MPL, CPL, and instrument ratings (IRs) for aeroplanes (A) and helicopters (H), published on 8 February 2018.

CS-ETSO / Amendment 13, published on 19 February 2018

Annex II to be or not to be...

One of a sudden discussions started at political and at Agency level questioning the crediting or hours flown on so-called "Annex II" aircraft. As the entire community does not understand why after years this is re-discussed, Europe Air Sports prepared and distributed the position paper attached. I shall keep you informed as soon as possible.

Europe Air Sports Technical Conference and Annual General Meeting, 16-18 March 2018, at Cologne

With Patrick Ky, Executive Director of EASA, as key note speaker of the Technical Conference, Friday part, will probably tackle what was mentioned above, besides other important topics. Do you need more information? Just send me a message!

Best wishes, kind regards

René Meier

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Distribution

EPFU Members
EPFU Board Members
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Today, first spring day according to the meteorologists?

