

APPENDIX I

Air EuroSafe

PART M REGULATORY IMPACT ASSESSMENT
CONSOLIDATED COMMENTS REPORT

SECTION A - TECHNICAL REQUIREMENTS**i) Sub Part: E COMPONENTS****Paragraph Reference: M.A.501 Installation****SAFETY IMPACT COMMENTS**

UK	<p>CAA 1: Introduces risk of migration of parts not eligible for use on aircraft being used for commercial air transport especially due use of the same EASA form 1.</p> <p>CAA 2: This requirement does not allow the fitment of parts that have been approved for aircraft use by change action (i.e. non-aviation items), not manufactured by a POA or fabricated by a maintenance organisation without complete technical data.</p>
FRANCE	DGAC: Sees no problem with the use of EASA form 1 issued either by a Part F or a Part 145 organisation. However, the fact that the acceptance of parts provided by brokers is not linked to any requirement (storage, traceability, origin etc) is the problem.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	<p>EAS1: The general remark regarding the definition of a component has been raised: in Part 21 engines and propellers are classified as products, and in Part M article 2, the term "components" include the engines and propellers. There is a contradiction in the texts.</p> <p>EAS2: The requirements of (a) and (b) do not distinguish between flight-safety critical and non-critical components or materials, and does not distinguish between classes of aircraft, when requiring that all must be released by an EASA Form One or equivalent. This will lead to problems related to installation of non-compulsory or "non flight safety critical" equipment in gliders, e.g. soaring flight computers / electronic variometers and GPS flight recorders which are not provided with an EASA form1.</p> <p>EAS3: For old aircraft not excluded in annex II of basic regulation, which has no support from the manufacturer (who no longer exists) standard parts are simply not always available and therefore alternative solutions have to be found, with due attention to airworthiness.</p> <p>EAS4: The requirement to abide by service limits of components is not consistent with the current arrangements for extending the lives of engines under, for example, UK CAA Airworthiness Notice 35, and many aircraft would be grounded if their engines were not able to continue in use beyond the manufacturers published TBO.</p> <p>VDS 1: Part 66 is not valid for CS-22 aircraft (actual status). Therefore national regulations regarding the qualification and experience of certifying staff remain valid for maintenance of gliders. As long as the national requirements remain unchanged there will be no effect upon the manufacturers in regard to maintenance in their own organisations.</p> <p>RRG1: Engines of corporate aircraft shall be carried out in subpart F organisations. Such engines cannot be installed on commercial air transport aircraft while the requirements for performing the maintenance are the same in subpart F and in Part 145 organisations (the maintenance programme is strictly the same and parts are provided by the manufacturer in both cases). There is a need that such engines could be installed in case of necessity also on commercial air transport aircraft.</p>

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: Paragraph AMC M.A.501(c) needs to provide the necessary clarity and recognise that many parts used are not aerospace specific, particularly in general aviation applications. (See recommendation) CAA 2: The acceptance of commercial parts fitted to balloons and gliders will need consideration. This may be addressed by the Part 21 review reference Part 21.A.307. (No further action required)
FRANCE	DGAC1: Not relevant to this RIA.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS1: Not relevant to this RIA EAS2, EAS3: See recommendation EAS4: M.A.302 (c) allows this activity to continue. No action required. VDS1: Accepted. No action required. RRG1: This will be a commercial decision made by industry. No action required.

ECONOMIC IMPACT COMMENTS

UK	CAA 1: Additional expense to private owners due need to use subpart F for component maintenance.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: For components that were maintained under the previous system and considered airworthy, but which have been stored for months/years, it will be very expensive to issue form 1 before installation according to M.A.501 a). Industry: Special historical heritage in Poland implies a great number of components designed and manufactured under Russian rules (outside JAR system and not marked under Part 21 Subpart Q). Discarding components of aircraft not accepted by EASA will have a severe economic impact on the industry.
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: There will be some additional expense when using an approved organisation instead of a BCAR (B or D) licensed engineer. (There are approximately (73) B and (34) D licences issued, of which there are approximately 20 practising licensed engineers). (This impact is not likely to be significant as it is expected the majority will continue as Subpart F organisations).
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO and industry: This will have a significant cost penalty and may result in additional maintenance in order to issue the appropriate documents and/or markings.
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Industry: This seems unrealistic for elementary tasks such as the repair of a damaged tyre or the recharge of a battery.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	(Industry): This could have an impact and therefore a recommendation has been made.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Safety recommendation

CAA 1, EAS2 & EAS3: Paragraph AMC M.A.501(c) requires revision to better clarify standard parts. At present it specifies that a TC holder may issue a standard parts manual. It also needs to specify that non-aviation parts detailed on STCs and other changes, including drawings associated with minor changes can be acceptable as standard parts when the change is approved.

Economic recommendation

CAO and industry: Investigation into the acceptance of these parts to be undertaken by EASA (Reference: AMC M.A.501 (a) /5). This is considered a CRITICAL (1.c) task

Other impact recommendation

French industry: annex VIII should be reviewed to ensure all elementary tasks have been captured.

Sub Part: E COMPONENTS

Paragraph Reference: **M.A.502 Component Maintenance**

SAFETY IMPACT COMMENTS

UK	BBGA 1: It is becoming almost impossible to obtain certificated parts for older aircraft due to the inability of approved organisations to obtain acceptable technical data. Where an OEM no longer exists there is often no design or spares support. It is believed this will lead to unofficial component repairs.
FRANCE	Nil
ITALY	Nil
SWEDEN	SBA 1: With approximately 100 Balloons operating in Sweden it will be difficult to obtain parts from an approved source.
POLAND	Nil
GERMANY	LBA: Under German national law the certifying staff for engines, APUs, propellers and ATM –equipment must hold a national licence class 4. The certifying staff for all other components should be assessed by the organization. A procedure for the assessment is described in circulation letter No. 19-04/03-0 .

	LHT1: requires that in front of M.A.502 (a): "Subpart E requirements are fulfilled when component maintenance is carried out in accordance with Part 145 requirements", or in front of M.A.501 (a): "Except for components maintained under Part 145, maintenance of components shall be carried out according to this subpart".
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SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	BBGA 1: This is outside of the capability of this RIA to resolve this issue. This would need a modification to AMC material.
FRANCE	Nil
ITALY	Nil
SWEDEN	SBA 1: This was not identified by the SCAA as a problem due to the introduction of Part M, for balloons and gliders the maintenance of components could be performed by the current national organisations if approved to Subpart F. (when explained this was not considered a significant impact)
POLAND	Nil
GERMANY	LBA: There is no significant impact as national rules apply for component maintenance. LHT1: This is considered answered by M.A.501 (a).

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	FFA: Under M.A.502 (a) it will be impossible for small air clubs to maintain their aircraft, unless as a minimum, Appendix VIII is reviewed. FFVV: Under M.A.502 (a), there will be an increase in the direct cost of components, the operational cost of immobilising equipment and the administrative cost of sending components to a subpart F or Part 145 organisation.
ITALY	AOPA: Minor maintenance should be authorised otherwise costs will increase dramatically.
SWEDEN	Nil
POLAND	CAO: Poland has only 16 JAR 145 organisations, only 3 of which can maintain components. Industry: Work done outside Poland, for Part 145 or equivalent Canadian organisations, is worth \$40 million a year. This regulation will make it more difficult to serve that market. There will be a need to set up special Part 145 organisations since Part M - M.A. 502 does not cover some aspects of component maintenance.

GERMANY	LBA: M.A.502 is no more onerous than German national law. Most of the component maintenance organisations are approved in accordance with Part 145. RRG1: the requirements of national laws are less stringent than Subpart F. There is a limited handicap for the German industry in terms of costs. VdS: For the manufacturers this regulation brings the new and additional burden to apply to become a Subpart F organisation in order to maintain CS-22 aircraft out of own production. This will have a substantial negative economic impact due to additional workload and costs.
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ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	FFA & FFVV: There will be an economic impact due to the possibility of aircraft being grounded. This impact is difficult to quantify but this could be alleviated if recommendation under M.A.501 is adopted.
ITALY	See France
SWEDEN	Nil
POLAND	Not assessed. Part 145 issue.
GERMANY	Nil for regulator. RRG1 & VdS: Economic impact on industry minimal. New regulation not that different from national law.

SOCIAL IMPACT COMMENTS

UK	PFA 1: Currently independent licensed engineers may overhaul Engines used for non-commercial aircraft. Part M will require a Subpart F approval for this work; this may mean loss of livelihood for these people.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	PFA 1: There is a total of 34 BCAR 'D' licenses issued of which it is estimated that 20 engineers are using the license to release EASA certificated engines to service. They will have the option of applying for a Subpart F approval. (This is not seen as a significant impact)
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Industry: The term "Component" is not clearly understood.
GERMANY	Industry: The term "Component" is not clearly understood as it differs from Part 21.

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	See Poland
FRANCE	See Poland
ITALY	See Poland
SWEDEN	See Poland
POLAND	Industry: The term "Component" has been given many interpretations by industry and needs further clarification.
GERMANY	See Poland

RECOMMENDATIONS

Safety recommendation
 BBGA 1: AMC to M.A.502 would benefit from additional material to identify the acceptable source of used components for older aircraft, balloons and gliders.
 Other recommendation
 Poland Industry: Components need to be more clearly defined within (EC) N° 2042/2003.

Sub Part: E COMPONENTS

Paragraph Reference: **M.A.503 Service Life Limited Components**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

Final consolidated report

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS**Sub Part: E COMPONENTS****Paragraph Reference: M.A.504 Control of Unserviceable Components****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Some pilot owners may resist this. Industry: Ref M.A.504 (e) It is felt that the fact that the Regulation does not require mutilation when components are transferred to a training organisation is a safety issue. It is understood that as a minimum, they should be partially mutilated to make them unserviceable or clearly marked as "unserviceable" when being transferred.
GERMANY	LBA: No requirements for the storage of 'unsalvageable components' for owner/ non-commercial operator under German national law exists. There are only requirements in accordance with Part-145 and national approved maintenance organisation (LTB).
	RRG1: There are numerous parts that were supposed to be mutilated (as engine vital components) and are not mutilated, therefore it is necessary to introduce some responsibilities by adding in M.A.504 (d)2: "to be mutilated by the organisation or under the control of the organisation..."

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Refer AMC M.A.504 (e)
GERMANY	Subject covered already in M.A.504 (d). Further clarification needed in AMC material.

ECONOMIC IMPACT COMMENTS

UK	AOPA, RAC & BBGA 1: M.A.504 (b) Unserviceable components removed by owners and individual licensed engineers cannot be easily stored in a secure location. Part M organisations may charge for this service. PFA 1: Destruction of parts where a repair schemes may be found in the longer term.
FRANCE	Nil
ITALY	ENAC: M.A.504 (d) Current national requirements in this matter are quite similar if not identical or more restrictive in certain circumstances. There is a specific ENAC Circular (NAV-66) on this subject; components must be mutilated and identified as unsalvageable. In case of approved organisation there is the requirement of a specific bonded area, an inventory and a responsible of the process; all personnel involved in the acceptance of materials and components must be conveniently trained. No additional costs or particular effect are expected.
SWEDEN	SCAA: The requirement may have an economic impact on aircraft owners but the requirement will hopefully decrease the amount of unapproved/ bogus parts on the market and is therefore supported.
POLAND	Industry: Scrapping of unserviceable parts or retaining those parts in a secure location is an expensive task that the maintenance organisation should not pay for.
GERMANY	Industry: No particular problems identified.

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	AOPA, RAC & BBGA 1: This is the current practise under national requirements and
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	therefore there is no additional penalty. PFA1 – Explained in M.A.504 (d).
FRANCE	Nil
ITALY	Accepted.
SWEDEN	Accepted.
POLAND	Considered minimum impact.
GERMANY	Accepted.

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	CAA 1: M.A. 504 (d) places obligations on organisation that do not legally own the part, also the requirements of M.A.504 (d) are more restrictive than Part 145.A.42 (d) which will incur additional expense.
FRANCE	DGAC: M.A. 504 (b) seems difficult to apply when no organisation accepts the storage of parts in cases where there is no maintenance contract. Industry: There are doubts about the compatibility of the requirement with property rights (the owner of the part may wish to keep the part for his private use or to make an evaluation).
ITALY	Nil
SWEDEN	Nil
POLAND	Industry: Some pilot owners may want their components returned to them.
GERMANY	EAS1: It is simply unrealistic to expect that in the light aircraft and glider environment, unserviceable parts would be identified and kept under the control of an approved organisation and stored in a secure place when they belong to individuals. Industry: There are doubts about the compatibility of the requirement with property rights (the owner of the part may wish to keep the part for his private use or to make an evaluation).

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: This is considered to be very difficult to control if the owner will not agree to the mutilation of a component. There could be legal conflict regarding ownership rights. This is out of this RIA.
FRANCE	Further AMC material is required.
ITALY	Nil
SWEDEN	Nil
POLAND	Industry: See UK assessment and recommendation
GERMANY	EAS1: See UK assessment and recommendation

RECOMMENDATIONS

Economic recommendation

AOPA, RAC & BBGA 1: – Provide additional AMC M.A.504 (b) material to explain what is meant by 'controlled by an approved organisation' and describe how M.A. 502 approved organisations control unserviceable components when they are held and stored by an owner, until a decision is made on the future status of such component.

ii) Sub Part: F MAINTENANCE ORGANISATION
Paragraph Reference: M.A.601 SCOPE

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	<p>LBA: National licenses below 5700 kg will be transferred to Part 66 licenses until 28th September 2006. Annex VII is comparable to German LuftBO limitation. Germany opt-out for Part-M Subpart F organisation until 28th September 2006.</p> <p>So no problem may occur. Industry comments</p> <p>VDS1: For some works (e.g. simple maintenance) the requirements might be too stringent.</p> <p>VDS2: Having a singular designated accountable manager might be not feasible for highly distributed organisations like the ones in existence.</p>

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	<p>LBA: Accepted.</p> <p>VDS1 & 2: Not significant impact.</p>

ECONOMIC IMPACT COMMENTS

UK	CAA 1: It is unclear how costs will be recovered for standardisation process in the non-CAT environment
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	<p>VDS1: Existing one-man maintenance organisations were qualified by having the proper qualification to inspect the maintenance work without the classification of complex / non-complex.</p> <p>The inspection qualification was classified according to the different working fields like structures (wood / metal / composites), engines, etc.</p> <p>This system has proven itself to be easy to work with and resulted in no safety concerns. With the introduction of the limitations of Part M Subpart F and Part 66 it is feared that several existing one-man organisations have to close down their operation with severe impacts on gliding in economical and social regards.</p>

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Standardisation process is an EASA activity, outside of this RIA.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	VDS1: One-man organisations can still exist as Subpart F organisations. Recommendation is made in M.A.605

SOCIAL IMPACT COMMENTS

UK	CAA 1: It is Possible that a number of the current national approved organisations may not transition to this more formal approval.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS1: The proposed changes could have significant organisational, legal and administrative implications.

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: This may mean fewer maintenance organisations at remote locations and it is unknown how many of the current 69 BCAR A8-15 organisations will disappear, we have estimated there will be between 50 and 60 converting to Subpart F and G approvals.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS 1: Impact will become visible once the system is in force.

OTHER IMPACT COMMENTS

UK	CAA 1: No guidance given on how a Subpart F organisation assesses its certifying staff competency for the release of complex tasks.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS1: For gliders these are a severe tightening of regulations, because in most European countries, Sailplane Technicians (or other equivalent national ratings) have been permitted to authorise or recommend continued airworthiness, and have been permitted to certify that a glider is released to service based on their personal license and not necessarily on the approval of an organisation. If these rules are implemented it is no exaggeration to say that it will cause the demise of gliding, for absolutely no gain in safety.

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: May cause confusion and acceptance of different standards therefore additional AMC material is recommended to clarify the requirement. (See recommendation)
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS 1: Impact will not be significant if the existing sailplane associations are approved in accordance with Subpart F.

RECOMMENDATIONS

Other impact recommendation

CAA 1: AMC or Guidance material needed on how to establish Subpart F certifying staff competency for complex tasks.

Sub Part: F MAINTENANCE ORGANISATION**Paragraph Reference: M.A.602 APPLICATION****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	CAA 1: There will be an economic impact on industry as CAA may increase charges to reflect additional time to administer the approval. CAA 2: Economic impact on industry to produce more formal procedures and A Maintenance Organisation Manual.
FRANCE	DGAC: In France there are approximately 350 organisations (17 JAR 145 did not apply to the Part 145 approval) 19 AEA, 277 UEA and 49 parachute workshops, which may apply together for, subpart F approval, creating important additional work.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: The CAA are at present unable to estimate the charge for a new combined F & G approval, although it is likely to represent an increase compared with the charge made under the current system. Until charges are finalised we are unable to assess the level of impact. CAA 2: Initial increase in industries cost to produce a formal manual may be offset in the long run by a more efficient organisation and increase in scope of work. (Cost of producing a new manual is approximately 70 to 100 man-hours)
FRANCE	DGAC: Additional man-hours required to approve each organisation is approximately 15 man-hours.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil

Final consolidated report

POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: **M.A.603 Extent of Approval**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA: The requirement for a maintenance engineers to have Subpart F approval instead of a special authorisation may mean that they may elect to stay out of business given the amount/frequency of work being performed. This may result in a black market and repairs being performed without any records.
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA: The risk is minimised if maintenance engineers elect to apply for a Part 66 license or Subpart F organisation approval.
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	ENAC: We consider these articles reasonable. AOPA: We consider these articles reasonable; although limitations for a one-man organisation are not at all clear (the articles do not appear to consider one man organisations). Subject to clarification, no additional costs are expected.
SWEDEN	SCAA 1: The Swedish authority have in the past issued a special authorisation to individual licensed engineers to perform some of the complex tasks listed in Appendix VII. Limiting these tasks to a Subpart F or Part 145 organisation may lead to black market repairs being performed without any records. This may make it more expensive for an owner to contract a Subpart F organisation for specialist repairs. Industry: This regulation adds to owners' costs.
POLAND	Nil
GERMANY	LBA: No impact. In general, Part M requirement is similar to requirement under German national law, although Germany has an opt out for Subpart F organisations until 28 September 2006. EAS: If these rules are implemented it is no exaggeration to say that it will cause the demise of gliding, for absolutely no gain in safety. Regarding 603 (a) it is impossible to comment without relevant paragraphs and tables being present (paragraphs 11 & 13 and Table 1 do not exist in Appendix 4) VdS: With the introduction of the limitations of Subpart F and Part 66 it has to be feared that several existing one-man organisations will have to close down their operation, with a consequent severe economic impact on gliding.

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Accepted.
SWEDEN	SCAA 1: Black market repairs are a continuing problem today and cannot be legislated for, while accepting it is a problem we do not believe it requires a rule change. There is likely to be an additional expense of contracting a Subpart F organisation instead of an individual but this cannot be quantified at this time.
POLAND	Nil
GERMANY	EAS 1 & VdS: Impact will not be significant if the existing sailplane associations are approved in accordance with Subpart F.

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: **M.A.604 Maintenance Organisation Manual**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA has no objection in the implementing of this rule, as it seems comparable with national requirements for maintenance organisation.

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Accepted

ECONOMIC IMPACT COMMENTS

UK	<p>CAA 1: The existing UK requirement, BCAR A8-15, only talks in terms of 'procedures'. The need to produce a Maintenance Organisation Manual (MOM) is new and as such an additional economic burden.</p> <p>BBGA & PFA 1: The cost of producing a maintenance organisation manual will be substantial both in the one-off preparation and the on-going amendments.</p>
FRANCE	<p>DGAC: A manual is already in place, but it will need to be totally recreated according to 604 (a), a task that is not negligible for small organisations. This will call for a complete study of all manuals by the Authority. The administrative burden imposed under 604(f) and 604(g) is onerous for small organisations.</p> <p>FFVV: Very small maintenance organisations may find it difficult to produce and keep up to date such a document due to lack of experience.</p>

	FFA1: At present the FFA membership comprises: 1/3 in 145 organisations, 1/3 in UEA and 1/3 in approved organisations. Rework of manuals may create significant costs (the modification of present manuals seems impossible).
	<p>FFA2: Criteria for approval are not well adapted for single engine simple design aircraft with MTOW below 2.0 T (the present level of qualification of mechanics is considered satisfactory and a level of training lower than is required by the Part 66 can be considered as more appropriate in return for greater experience). Initially, half of the engineers will be insufficiently qualified.</p> <p>SNPACM: Difficulty in satisfying all requirements together. Deadline is too short for small structures.</p> <p>AOPA: Very small maintenance organisations may find it difficult to produce such a document.</p> <p>SNIPAG: Fear of increase in major administrative costs.</p>
ITALY	AOPA: These requirements are reasonable, providing, in the case of small organisations, the same name can appear in more than one position and that the required paperwork is simplified and reduced to minimum reasonable levels. (This may not be so in the case of Italy)
SWEDEN	SBA: This regulation will cause unnecessary costs in a non-complex sector
POLAND	Nil
GERMANY	<p>LBA: 604(a). A manual is already in place, but it will need to be totally recreated, a task that is not negligible for small organisations. This will call for a complete study of all manuals by the Authority. The administrative burden imposed under 604(f) and 604(g) is onerous for small organisations.</p> <p>VDS: Most existing organisations will be forced to write and apply for certification of new organisational manuals without a real safety benefit but with the burden of the associated workload and cost.</p> <p>EAS: These rules impose a severe increase in the requirements for glider maintenance, with respect to paperwork. These rules appear to have been developed with a relatively large commercial maintenance organisation in mind.</p> <p>EGU: Most club workshops will have to produce an organisation manual if they want to apply to become a subpart F organisation. This will increase their administrative workload and probably also cost money without real safety benefit.</p> <p>Other Industry: No particular problems identified.</p>

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1 & BBGA & PFA 1: The cost of producing a Maintenance Organisation Manual for a small organisation is estimated to be 70 to 100 man-hours based on information provided by 5 small maintenance organisations. The impact will be reduced if Appendix IV to AMC M.A.604 is used.
FRANCE	<p>DGAC, FFFV, FFA1, AOPA & SNIPAG: See UK assessment.</p> <p>FFA2: The current system is not ICAO compliant, therefore has not been assessed.</p> <p>SNPACM: Comment not accepted.</p>
ITALY	AOPA: Accepted
SWEDEN	SBA: See UK assessment.
POLAND	Nil
GERMANY	LBA, VDS, EAS & EGU: See UK assessment.

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Industry1: There is a risk of competition in the recruitment of mechanics between the public transport and general aviation industries. Industry2: Regarding type training, there is a risk that manufacturers or their representatives may create a monopoly.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Industry1: This is almost the current situation. Industry2: Type training can be performed by a Part 147 organisation.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	CAA 2: The very small maintenance organisations may find it difficult to produce and keep up to date such a Maintenance Organisation Manual.
FRANCE	DGAC: The formalisation of a maintenance work package is a complicated process in small organisations. It may create difficulty rather than affect safety.
ITALY	Nil
SWEDEN	SCAA 1: A similar requirement to current national regulations for approved organisations.
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 2: This is a formal approval and the MOM can be very simple for small organisations, therefore this is not considered a significant impact.
FRANCE	DGAC: Appendix IV to AMC M.A.604 should be used with consideration to the size and complexity of the organisation. Further AMC material should be provided.
ITALY	Nil
SWEDEN	SCAA: Accepted.
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Other comment recommendation:

DGAC: Appendix IV to AMC M.A.604 in paragraph 2. Content should specify the content of the manual should be adapted to the size and complexity of work carried out in the organisation.

Sub Part: F MAINTENANCE ORGANISATION
Paragraph Reference: M.A.605 Facilities

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

Final consolidated report

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	<p>CAA 1: Within the United Kingdom, Hot-Air Balloons have never previously been required to be maintained by an approved facility, but relied on a suitable location for maintenance and inspection.</p> <p>CAA 2: AMC M.A 605(a) – as written applies to larger aircraft. Doesn't work for balloons. Needs to reflect the industry we are talking about.</p> <p>BBGA & PFA 1: The more explicit and demanding requirements for a Subpart F organisation seem to be overly bureaucratic in particular the "hangar visit plan" (AMC M.A.605 (a)) and assessment of unserviceable equipment (AMC M.A.605(c) 6 & 7).</p>
FRANCE	Nil
ITALY	Nil
SWEDEN	SBA 1: Balloons need a simplified system of repair stations.
POLAND	Nil
GERMANY	EAS: These requirements are simply unrealistic for the majority of gliders and light aircraft owners, and unnecessary, though the general intent of having some "order and organisation" of work is sufficient. These rules impose a severe increase in the requirements for glider maintenance, with respect to facilities. These rules appear to have been developed with a relatively large commercial maintenance organisation in mind.

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	<p>CAA 1 & 2: AMC.605 (a) refers to organisations having hangars. Balloons and Airships can be inspected to a satisfactory standard and particularly the envelope if it is laid outside of a building and either cold or hot inflated. It is not necessary to conduct this work inside a "hangar". Within the United Kingdom, balloon inspection has been conducted by approved inspectors in this manner with the approval of the Civil Aviation Authority since 1972 without any concerns. If further rectification is required for say sewing new panels within an envelope then only this is required to be conducted at a suitable location in terms of equipment and facilities appropriate to the task. (See recommendation for additional AMC material).</p> <p>BBGA & PFA 1: The impact on small organisations could be significant if the AMC material is rigidly adhered to requiring unnecessary time and expense to meet large aircraft standards. (See recommendation for additional AMC material regarding balloons) See Swedish comment.</p>
FRANCE	Nil
ITALY	Nil
SWEDEN	SBA 1: As above this requires further AMC material to clarify the implementation for balloons. It is difficult to assess the impact on balloons, as the facility requirements are not specifically defined. If enclosed hangar facilities are required this will have a significant impact. The impact on small organisations could be significant if the AMC requirements are rigidly adhered to requiring unnecessary time and expense to meet large aircraft standards. If a comment "facilities acceptable to competent authority" is inserted into this paragraph, the economic impact would be minimal. See recommendation for additional AMC material
POLAND	Nil
GERMANY	EAS: See Swedish comment.

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Economic recommendation.

CAA 1 & 2 & BBGA & PFA 1, SBA1 & EAS: Recommended additional paragraph: -

AMC M.A.605 (a) 4. Gliders, balloons and airships may be inspected at a location other than a hangar, where the weather and ground conditions are suitable to achieve satisfactory inspection standards, and prevent the glider, balloon or airship from damage. Other maintenance must be conducted at a facility suitable for the intended task. The environmental and facility conditions required for inspection and maintenance must be defined in the Maintenance Organisation Manual.

Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: **M.A.606 Personnel requirements**

SAFETY IMPACT COMMENTS

UK	<p>CAA 1: This paragraph states specialist tasks like welding and NDT must be performed by staff qualified in accordance with an officially recognised standard – this should be more specific.</p> <p>CAA 2: For a small organisation it is unrealistic to expect them to have available all of the necessary certifying staff. Avionics cover in particular is not readily available and the industry at the light end of the scale is totally reliant upon the use of contracted staff.</p> <p>BBGA 1: Most of the personnel requirements will be filled by one person in a small organisation, the need to record all sub-contract staff qualifications is added bureaucracy.</p>
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FRANCE	DGAC: It is difficult to understand the 606(d) requirement; it needs clarification. FFVV1: There is a need for specialists to be able to certify their own work (e.g. repair of wooden structure).
ITALY	Nil
SWEDEN	SCAA 1: No effect as national requirements use a license for certifying staff.
POLAND	Industry: Safety positive impact: Description on when/how subcontracted personnel is allowed to work is better addressed than in Part 145 or national regulation.
GERMANY	LBA: The regulation is not precise enough. As worded, it could create a safety impact. Evidence of competence in relation to components needs to be demonstrated, especially in the avionics field. LBA: No effects expected, because LTBs must use their own certifying staff or the sub-contractors must have the certifying staff, who holds the necessary licenses.

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: If each authority officially recognised standards are not identified/listed, safety may be compromised by the lack of transparency when accepting welding, NDT, etc from around Europe. (We do not consider a rule change is required). CAA 2: The AMC M.A.606 (d) material provides flexibility to accept contract arrangements on a permanent basis. Therefore if a small organisation has a standing contract for support with a B2 (avionics) engineer then this would be a temporary arrangement therefore he could certify as an authorised person. See recommendation. BBGA 1: Difficult to quantify the safety impact of additional paperwork and records, it may be beneficial in promoting better working practises. (The above are not considered significant impacts requiring a rule change)
FRANCE	DGAC: See recommendation for additional AMC material. FFVV: Current system is not ICAO compliant. Aircraft must be released by Part 66 qualified staff.
ITALY	Nil
SWEDEN	Nil
POLAND	Industry: Accepted.
GERMANY	LBA: Competence of Certification Staff for components is in accordance with current national requirements

ECONOMIC IMPACT COMMENTS

UK	CAA 1: There would be a major Economic penalty associated with having to recruit full time certifying staff. Cost to owner may increase due organisations not being able to cover short-term high workload.
FRANCE	DGAC: Under regulation M.A. 606(d), subcontracted staff not having permission to issue a certificate of release to service may create serious difficulties for small organisations (in the case of personnel on leave, sick or on maternity leave).
ITALY	ENAC 1: Any additional costs to the regulatory authority under M.A. 606 (g) are likely to be offset by revenues received from certification of new organisations and expected savings attributable to the authority being no longer directly involved in every aircraft C of A renewal. AOPA: M.A. 606 (g) will cause a slight increase in costs unless care is taken to limit the paperwork requirements.
SWEDEN	Industry: There will be additional costs of having to recruit full time certifying staff.
POLAND	CAO: There will be a transitional problem for the authority, with 5,000 Part 66 licences to be issued by the end of 2005. CAO 2: (Ref AMC M.A.606 (f)/4) For those countries where no national aerospace NDI board exist, getting qualification as per EN4179 in another country will impact economically on those organisations. Industry: There will be a transitional problem for smaller organisations in the industry.

	Time must be allowed for the additional training that will be required to raise qualification to Part 66 level. If not, there will be severe cost implications.
GERMANY	<p>LBA: The proposals represent only minor changes to the way assessment is organised.</p> <p>BBAL: It will be hard for smaller companies to meet these requirements. M.A 606 (g) will also cause an increase in costs because of the need for additional training of certifying staff.</p> <p>VDS1: For already existing one-man organisations the requirements would present an unworkable situation despite the fact that those organisations have proven themselves very well in the past.</p> <p>EAS1: The main concern of EAS is the requirement, as set out in paragraph M.A. 606 (g), that 'the maintenance organisation shall have sufficient certifying staff to issue M.A.612 and M.A.613 certificates of release to service for aircraft and components. They shall comply with the requirements of Part-66'.</p> <p>EGU: Under this regulation, a one person Subpart F organisation will incur administrative burdens to meet certification approvals that are likely to result in an unworkable situation in sport aviation maintenance where the difference between profit and insolvency is frequently marginal.</p>

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: The AMC M.A.606 (d) material provides flexibility to accept contract arrangements on a permanent basis. Therefore if a small organisation has a standing contract for support with a B2 (avionics) engineer then this would be a temporary arrangement therefore he could certify as an authorised person. See recommendation. The cost is therefore negligible compared to current practises.
FRANCE	See UK assessment.
ITALY	<p>ENAC1: Accepted</p> <p>AOPA: Accepted but no major impact.</p>
SWEDEN	Industry: See UK assessment.
POLAND	<p>CAO1: Not Part M issue</p> <p>CAO2: This is an accession State issue and should be part of the accession State assimilation.</p> <p>Industry: Not Part M issue</p>
GERMANY	<p>LBA: Accepted.</p> <p>BBAL: Minimal impact on regulator, but there may be minimal financial consequences for the industry.</p> <p>VDS: The one-man organisation can still exist under this Regulation.</p> <p>EAS1: There should be a minimal impact on the issuance of Part 66 licenses based on grandfather rights.</p> <p>EGU: See VDS assessment</p>

SOCIAL IMPACT COMMENTS

UK	CAA 1: For a small organisation it is unrealistic to expect them to have available all of the necessary certifying staff. Avionics cover in particular is not readily available and the industry at the light end of the scale is totally reliant upon the use of contracted staff.
FRANCE	SNPACM: A single person organisation will not be viable under this regulation. FFVV: It will be difficult for engineers to change their licences to Part 66. It may drive away certain activities of small aero clubs who currently rely on voluntary workers, and who will not be able to bear the consequent increase in charges. There will be a reduction in the numbers of participants, numbers of aircraft, aircraft sales and associated business activities.
ITALY	ENAC 1: Paragraphs M.A.606 and 66.A.20 do not allow Category A and C aircraft maintenance licensed personnel to perform certifying staff privileges within a Subpart F maintenance organisation. Many current national maintenance organisations in Italy rely in the national licensed engineers, equivalent to Part-66 category "A", as certifying staff for maintenance duties equivalent to line maintenance in Part 145 organisations. This fact is considered in Italy as a reduction of privileges of current maintenance personnel equivalent category "A" and will have a social impact. It is not probably that these mechanics will apply for upgrading to category B1/B2. This is sustained by the following numbers of AML equivalent personnel working in maintenance organisation for aircraft under 5700 kg: cat A: 246, cat B: 284, cat C: 74. ENAC and industry suggest considering a change in the regulation allowing Part 66 category "A" AML to work as certifying staff in Subpart F maintenance organisations for a limited scope of work.
SWEDEN	Nil
POLAND	Industry: There will be a transitional problem for smaller organisations in the industry. In some cases staff previously carrying out tasks will no longer be able to do so.
GERMANY	LBA: For the release of components the assessment of the certifying staff may be a problem, because the person cannot assess himself. Especially for NDT the requirements cannot be followed without external assistance, which should be acceptable to follow the high standards. EAS: There is a real risk that very few CRS staff will be qualified for old aircraft, or simple design aircraft, implying that the release will not be facilitated. Therefore it should be anticipated that the M.A.606 (g) requirement will not be applicable to these aircraft. A viable solution would be the introduction of an Appendix IX, which presents the requirements for a certifying staff for the release of vintage or simple design aircraft. This Appendix would be based on the principle of a downgraded Part 66. BBAL: It will be hard for smaller companies to meet these requirements. EGU: Under this regulation, a one person Subpart F organisation will incur administrative burdens to meet certification approvals that are likely to result in an unworkable situation in sport aviation maintenance where the difference between profit and insolvency is frequently marginal.

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: this may force existing small organisations (one-man) to consolidate into larger groups and for better control over the use of sub-contract staff, however a one-man organisation can still exist.
FRANCE	SNPACM: one-man organisations are feasible. FFVV: Part 66 issue, and the problem should be minimised by the issuance of Part 66 licenses.

ITALY	ENAC 1: There may be a social impact under M.A.606 (g) due to the fact that in the conversion phase from national to Part M system, some national AMLs may be not converted. It is recommended the issuance of Part 66 restricted category B1 limited to grandfather rights for the referred personnel.
SWEDEN	Nil
POLAND	Industry: Accepted, minimal impact.
GERMANY	LBA: Certifying staff in a one-man organisation will be assessed by the competent authority. No impact for the industry. EAS: This is a Part 66 issue. BBAL & EGU: Difficult to substantiate. No further assessment.

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: Time will be needed to explain to the industry the definition of accountable manager and for the industry to identify him.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Required conversion of licensing from national system to Part 66 as required under M.A.606 (g) for certifying staff in a Subpart F organisation will take longer in Poland than the dates foreseen in the Regulation. This fact could create a lack of continuity in the system.
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: No significant impact.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: This is an assimilation issue and not subject to this RIA.
GERMANY	Nil

RECOMMENDATIONS

Safety and Economic recommendation

CAA2: AMC M.A.606 (d) material should provide an explanation of how a permanent contract for temporary work can be provided by certifying staff.

Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: **M.A.607 Certifying Staff**

SAFETY IMPACT COMMENTS

UK	CAA 1: M.A.607 (b) this text is lifted from JAR 145.30 (j) and has proven difficult for large operator/MOs to comply with in the UK. It is unrealistic to apply this to light aviation where there is no real organisational infrastructure.
FRANCE	FFVV: M.A.607 (b) would preclude the possibility of repairing in a remote location and incite repair without reporting. The FFVV wishes to see this requirement cancelled. Under 607b, there will be a negative impact on safety, due to an incentive to hide the need for repairs.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: M.A.607 (b) is overly restrictive and could lead to work carried out without adequate records. Work performed by unknown persons/organisations when an aircraft is grounded should be controlled and appropriately certified. As a Subpart F organisation has no quality system to assess equivalent company or individual authorisations, a more appropriate place for the acceptance of certifying staff other than Part 66 staff would be in Subpart H. (See recommendation)
FRANCE	FFVV: See UK assessment
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	CAA 1: There is an economic impact of having to implement a system to record and inform the Competent Authority when issuing one-off authorisations. A preferred means of compliance would be to allow the organisation to retain a record that could be audited. BBGA 1: The need to document and record certifying staff authorisations is yet more unnecessary bureaucracy for a small organisation, these requirements are too close to Part 145.
FRANCE	Industry: The consequence of M.A. 607a is an increase of costs, a decrease of flying hours and aircraft numbers. FFVV: Under M.A. 607b, additional costs may be generated for sending staff for the repairing of aircraft, moving equipment to a different location, courier charges and the costs of immobilising aircraft.
ITALY	ENAC: We consider these articles reasonable. AOPA: We consider these articles reasonable in general, although limitations for a one-man organization are not at all clear (the articles do not appear to consider one man organisations). No additional costs are expected.
SWEDEN	SCAA: The requirement for a maintenance engineers to have Subpart F approval instead of a special authorisation may mean that they may elect to stay out of business given the amount/frequency of work being performed. This will make things more difficult/ expensive for aircraft owners. Industry: This regulation adds to owners' costs.
POLAND	Nil
GERMANY	EAS: These rules impose a severe increase in the requirements for glider maintenance, with respect to personnel and staffing. These rules appear to have been developed with a relatively large commercial maintenance organisation in mind.

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: M.A.607 (b) is overly restrictive and could lead to work carried out without adequate records and additional expenses which are difficult to quantify at this point and that would be alleviated without additional cost if the safety recommendation is accepted. BBGA 1: The requirements of Subpart F are good working practises for approved organisations as long as the requirements are implemented in a practical manner. This is not considered a significant impact.
FRANCE	Industry: Impact is due to the need to comply with ICAO requirements, although further AMC material is needed to clarify the rule. FFVV: For gliders, national rules will continue to apply and this is no seen as a significant impact.
ITALY	Accepted
SWEDEN	SCAA & industry: No impact if the AML person remains as independent license engineer in accordance with M.A.801

POLAND	If the regulation is implemented flexibly, additional costs should be minimal.
GERMANY	EAS: There is an impact, and further AMC material is needed to clarify the rule. For gliders, national rules will continue to apply and this is not seen as having a significant impact.

SOCIAL IMPACT COMMENTS

UK	CAA 1: small maintenance organisations who depend upon support provided away from base by third party maintenance organisations could have this activity restricted in the countries where ICAO licenses are not issued.
FRANCE	<p>DGAC: In approved organisations, the requirement for certifying staff does already exist, but the requirement looks complex for small aviation organisations.</p> <p>The obligation to have category C certifying staff may create problems in the approved JAR 145 organisations, which did not wish to move transition to Part 145, and for similarly structured AEA organisations that will apply for a Subpart F.</p> <p>FFVV: The M.A. 607a requirement for recent experience is unrealistic. This would threaten the existence of clubs having maintenance of aircraft carried out by retired mechanics</p> <p>SNPACM: Under M.A. 607, single man organisations do not look viable. The requirement for recent experience is unrealistic and requirements for continuous training are unrealisable for single man organisations.</p> <p>FFA: It is feared that Part 66 regulation reduces the possibility of holding multiple-aircraft type licenses implying the harmonization of the models of aircraft.</p> <p>AOPA: Generally speaking, the text is not well adapted to small organisations.</p>
ITALY	Nil
SWEDEN	Nil
POLAND	Industry: Under M.A. 607 (b) 2, given the 5 years experience requirement, there will be an insufficient number of qualified people available.
GERMANY	<p>EAS1: In general aviation there are numerous mechanics having the capacity of issuing a CRS and which apply for a licence 66, most of these people are working on a voluntary basis. The requirement specified in 607(a) 1 for the 6 months experience would prevent a lot of these people of being able to satisfy the requirement and create a disappearance of some of these licences.</p> <p>VdS: With the introduction of the limitations of Subpart F and Part 66 it has to be feared that several existing one-man organisations will have to close down their operation, with a consequent severe social impact on gliding.</p>

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: No impact if safety recommendation is followed.
FRANCE	<p>DGAC: The EASA work plan includes the requirements for Part 66 category A and C licenses for aircraft <5700kg. We are unable to assess the future Part 66 requirements regarding category A and C licenses within approved organisations.</p> <p>FFVV: For gliders, national rules will continue to apply and this is not seen as having a significant impact.</p> <p>SNPACM: No impact if the AML person remains as independent license engineer in accordance with M.A.801</p> <p>FFA: This is a Part 66 issue. No impact assessment needed under this RIA.</p> <p>AOPA: Recommendation already been made to clarify the rule.</p>

ITALY	Nil
SWEDEN	Nil
POLAND	Industry: M.A.607 (b) is overly restrictive and could lead to work carried out without adequate records. This impact is difficult to quantify at this point but it would be reduced or eliminated if safety recommendation is accepted.
GERMANY	EAS: It is accepted that this will affect certifying staff working on a voluntary basis. VDS: one-man organisation will still exist under Part M. This should not have a significant impact on the gliding community.

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Industry: Regulation does not identify clearly the experience required for staff described under paragraph b.2. It is understood some AMC material could be added to clarify this subject.
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Industry: AMC material for M.A.607 (b).2 needs further clarification, due to the number of comments received from all countries in the sample selected.
GERMANY	

RECOMMENDATIONS

Safety & Economic recommendation

CAA 1 & CAA 2: Rule change –

M.A.607 (b) 2. to any person with not less than **3 years** maintenance experience and holding a valid **National** aircraft maintenance licence rated for the aircraft type requiring certification provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the license of that person.

All such cases must be reported to the **contracted Subpart G organisation responsible for continuing airworthiness management** when contracted in accordance with M.A.201 (e), or the competent authority otherwise within seven days of the issuance of such certification authorisation. The approved maintenance organisation issuing the one off certification authorisation shall ensure that any such maintenance that could affect flight safety is re-checked.

Economic & Other recommendation

DGAC & Poland industry: Additional AMC material required for M.A.607. See new M.A.801(c)

Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: M.A.608 Components, Equipment & Tools

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS1: The text in 608 is issued from the Part 145 and has not been adapted to general

	<p>aviation. It is proposed to change the text with: “the person undertaking the maintenance of aircraft shall ensure that appropriate tools are available and that tools needing verification or a calibration are verified or calibrated to an official standard.</p> <p>EAS2: The reference to the M.A.609 maintenance data for tools is unnecessary, as some maintenance data of small aircraft do not refer to tools; the requirement for demonstrating that he has access to other tools or equipment used only on occasional basis is too strict for small aviation. This is especially true for individuals licensed engineers.</p>
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SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	<p>EAS1: This is not considered as a safety issue. Therefore changing the rule is not required for this topic. Nevertheless further AMC clarification is required.</p> <p>EAS2: No considered significant impact as equivalent tools are allowed in accordance with the rule.</p>

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil.
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil

ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: F MAINTENANCE ORGANISATIONParagraph Reference: **M.A.609 Maintenance Data****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: The requirement for having tasks cards is onerous for small organisations, especially when there is no relevant data from the manufacturer. A particular problem arises for aircraft that are out of production, where approval of maintenance data arrives from the agency.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: There is a risk of an incorrect interpretation of M.A.401(c) that the authorities may impose the requirements for tasks cards for all maintenance. This will increase costs, which we are unable to quantify. To avoid this risk it is recommended further explanation under AMC M.A.401.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil

GERMANY	Nil
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SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Economic recommendation:

DGAC: AMC M.A:401 material required to clarify the use of task cards.

Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: **M.A.610 Maintenance Work Orders**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil

GERMANY	Nil
ECONOMIC IMPACT COMMENTS	
UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	AOPA 1: A written work order between the owner and maintenance organisation does not seem to have any thing to do with airworthiness and should not be in the technical requirements.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	AOPA 1: This was not the view of the maintenance organisations that prefer an agreement to clearly establish the maintenance to be carried out. It is considered part of the technical requirements as the agreement establishes the requirements and responsibilities of owner/organisation managing maintenance and the organisation performing the maintenance tasks. (Not considered a significant impact)
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: F MAINTENANCE ORGANISATION**Paragraph Reference: M.A.611 Maintenance Standards****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: **M.A.612 Aircraft Certificates of Release to Service**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS/EGU: In order to limit the amount of paperwork, a written entry in the aircraft technical logbook should be acceptable for work carried out on simple design aircraft.

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS/EGU: No impact assessed. Considered as misunderstanding of M.A.612 . No change from current practises.

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: **M.A.613 Components Certificates of Release to Service**

SAFETY IMPACT COMMENTS

UK	CAA 1: The EASA Form 1 produced by a Subpart F organisation does not differ from a EASA Form 1 produced by a Part 145 organisation. How will the end user know whether the component has been released for service for commercial air transport or not?
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS1: A form 1 should not be required for the equipment installed on light aircraft which are not part of the type definition EAS2: some parts are installed on gliders as GPS calculator ... which are not aeronautical products. The text should introduce the possibility of installing such parts on board of simple design aircraft

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: If EASA form 1 is not clearly identified for non-commercial air transport, this could lead to the use of unapproved parts. To avoid this risk, we propose the following amendments: Appendix II block 19 completion instructions, which require the 'other regulation' box to be ticked and then the Part M CRS to be entered into block 13 (AMC M.A.801 (d)). However the form could be clearer as it has been assessed that components released by a Subpart F organisation could be inadvertently used on commercial or large aircraft. To remove ambiguity when using the EASA Form 1 for maintenance release from a Part M Subpart F organisation a recommendation has been made to change Appendix II. (See recommendation)
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS1 & EAS2: There is a category of portable equipment, which is not part of the type definition and therefore does not require a form 1. We understand that the regulation is not clear for the standard parts used in modifying the aircraft and could mean safety equipment is removed unnecessarily. A recommendation is made to extend the AMC material to address this category of equipment.

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil

SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Safety Recommendation

CAA 1: Add the following statement to Appendix II (EASA form 1) block 13 completion instructions - *Part M Certificate of Release to Service* and remove - *M.A. Subpart F approval reference*.

Make the following changes to block 19 - *Block 19 Contains the required release to service statement*
 For all maintenance by M.A. Subpart F approved maintenance organisations *the box "other regulation box specified in block 13" should be ticked and the certificate of release statement made in block 13.*
~~When non Part M maintenance is being released block 13 shall specify the particular national regulation.~~
~~In any case the appropriate box shall be 'ticked' to validate the release~~

EAS1 & EAS2: AMC M.A.501(c), definition of standard parts is required to be extended to include portable equipment.

Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: **M.A.614 Maintenance Records**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: F MAINTENANCE ORGANISATION

Paragraph Reference: **M.A.615 Organisation's Privileges**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS**Sub Part: F MAINTENANCE ORGANISATION****Paragraph Reference: M.A.616 Organisational Review****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	
ITALY	IBAA 1: The "organisational review" system is questionable to be a proof of revision in small organisations (from 2 to 10 people). IBAA 2: suggests, in order to avoid the lack of independence of the organisational reviews, that it would be better to define safety indicators in the organisation manual to control the organisations and anticipate poor practices.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	IBAA 1: Minimal safety impact. IBAA 2: Minimal safety impact.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	AOPA 1: This Part M provision is not required under the current Italian Regulation. Industry is sceptical that ENAC will create disproportionate bureaucracy in implementing this. ENAC 1: ENAC: implementation will have a cost impact since previously it did not exist.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	AOPA 1: If Organisational reviews are carried out in a practical manner and reasonable time it will have a minimal economic impact. ENAC 1:– Idem.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	CAA 1: Currently there is no UK requirement to this effect for light aviation for aircraft operated with out an AOC. An organisational review would be meaningless in most instances for a very small organisation.
FRANCE	Industry: A general comment from French industry was that they had similar concerns about the usefulness of an organisational review.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: There will be an initial cost and burden to set the system up, which is estimated to be approximately 4 hours work per year. However it is considered best practise to review organisational procedures on a regular basis. The impact would be reduced if this material was placed in AMC.
FRANCE	Industry: refer to CAA 1 comment.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: **F MAINTENANCE ORGANISATION**
 Paragraph Reference: **M.A.617 Changes**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

Sub Part: F MAINTENANCE ORGANISATION**Paragraph Reference: M.A.618 Continued Validity****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: Under the Italian national regulations, ENAC re-issues authorisation to maintenance organisation every two-year period rather than given unlimited authorisation. This will have some impact in ENAC internal organisation and procedures as National Aviation Authority.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: This will only require ENAC internal changes to adapt to the new system, so it is assessed as minimal impact.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: **F MAINTENANCE ORGANISATION**
Paragraph Reference: **M.A.619 Findings**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATIONParagraph Reference: **M.A.701 Scope****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	The LBA sees no specific difficulty in the implementation of this rule.

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Agreed

ECONOMIC IMPACT COMMENTS

UK	<p>PFA, BBGA & AOPA 1: Concern about the cost of two approvals replacing the existing single approval, consideration needs to be given to a charging scheme for Subpart F & G. Dual charging for combined organisations. We also question the need for a Subpart G approval for small non-commercial aircraft. BBGA believe that a one-man Subpart F can also hold a Subpart G approval.</p> <ul style="list-style-type: none"> • Liability Insurance for Subpart G organisations is a big concern.
FRANCE	Industry: There is concern about the cost of two approvals.
ITALY	Nil
SWEDEN	Nil
POLAND	Industry: A subpart G organisation will have to be set up for some groups of mainly small organisations, creating additional costs.
GERMANY	<p>Industry: For gliders in particular, these are a severe tightening of regulations, because in most European countries, Sailplane Technicians (or other equivalent national ratings) have been permitted to authorise or recommend continued airworthiness, and have been permitted to certify that a glider is released to service, based on their personal license and not necessarily on the approval of an organisation.</p> <p>The gliding world has functioned quite satisfactorily over many years, in terms of airworthiness and maintenance safety record, with a combination of some commercial workshops and club or home-based facilities in which individuals conduct the work on a voluntary or self- help basis. The costs of ownership and operating are thereby kept low for those who cannot afford or do not wish to use commercial maintenance services.</p> <p>Owners will be charged with fees for Subpart G organisation for the work it carries out and for the statutory payments to the NAA for airworthiness fees etc. The increase in costs will be significant for private owners operating aircraft for recreational purposes</p>

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	<p>PFA, BBGA & AOPA 1: The scale of charges is not yet known, but is likely to represent an increase compared with the current system.</p> <p>PFA, BBGA & AOPA 2: By increasing the frequency of this activity from every 3 yrs to 1 yr the costs will rise depending on authority and Subpart G charges. There is likely to be a resource impact on CAA to administer this approval for aircraft below 2730Kgs since current UK arrangements are not as prescriptive as sub part G. However, this is likely to be more than offset by cost savings elsewhere in the organisation.</p> <p>There may be a liability insurance implication for Subpart G organisations.</p>
FRANCE	Industry: Potentially there is a significant impact. This is dependant on the final level of fees and charges yet to be decided.
ITALY	Nil
SWEDEN	Nil
POLAND	Industry: Potentially there is a significant impact. This is dependant on the final level of fees and charges yet to be decided.
GERMANY	Industry: Potentially there is a significant impact. This is dependant on the final level of fees and charges. The cost of a Subpart G approval to each owner will depend on the organisation and how many owners contract a Subpart G organisation.

SOCIAL IMPACT COMMENTS

UK	<p>CAA 1: There is a significant risk that many private aircraft owners will present their aircraft to the CAA for the issue of the ARC every 12 months as we cannot predict industries participation in obtaining Subpart G approvals. A significant factor will be the level of Fees charged.</p> <p>CAA 2: The impact will be an increase to CAA resources due to the formal approval replacing the current process requiring additional surveyor time.</p> <p>BBGA 3: Question the need for a Subpart G approval for small non-commercial aircraft, BBGA believe that a one-man Subpart F can also hold a Subpart G approval.</p>
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FRANCE	Industry: There is a possibility that a number of the current national approved organisations may not achieve transition to this more formal approval.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: Every indication is that industry is interested in obtaining Subpart G approvals either as stand alone or to supplement a Part 145 or Subpart F approval. In this case there will not be a significant impact. If this is not the case there will be a significant impact for industry and the current authority manpower requirements. (CAA 2) – Research carried out by CAA indicates that a Subpart G approval will require approximately 5-10% increase in surveyor time, this is when combined with a Subpart F approval and this will affect approximately 60 existing M3 approved organisations. (BBGA 3) – A one-man Subpart F can also hold a Subpart G approval
FRANCE	Industry: The Impact will affect the DGAC as this may produce an increase in the annual workload.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Industry: It is recommended that the full airworthiness review and recommendation should be carried out by a Subpart G for the issue of an ARC every 3 years, with an intervening 1st and 2nd year inspection carried out of the aircraft documents by an appropriately licensed engineer. The requirement for formal sub part G approval would be too onerous.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: This regulation may not be strict enough. Industry: Many concerns regarding the meaning of the regulations as worded
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Industry: This recommendation is not supported, as it does not give any advantage compared with the current system.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: This comment is not accepted. Industry: This is a common comment throughout industry. Lack of understanding of the rule could be addressed by the development of guidance material.
GERMANY	Nil

RECOMMENDATIONS

Other recommendation
CAO: We recommend that guidance material is produced to clarify the many misunderstandings of this Subpart G.

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION**Paragraph Reference: M.A.702 Application****SAFETY IMPACT COMMENTS**

UK	RAC & BBGA 1: We can see no obvious safety improvement therefore Subpart G needs to be justified properly.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	RAC & BBGA1: A Subpart G approval helps to clarify the continuing airworthiness responsibilities of the owner and operator.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	CAA 1: Economic impact on industry as CAA will increase charges to reflect additional time to administer approval. Economic impact on industry to produce more formal procedures and CAME. RAC & BBGA & AOPA 1: We do not believe many individual owners will contract Subpart G organisations because of the additional cost an additional approval will incur.
FRANCE	Industry: Consideration needs to be given to a charging scheme for Subpart F & G with dual charging for combined organisations. FFVV: Nowadays the continuing airworthiness management is ensured by the clubs with oversight of the authority. The creation of a subpart G organisation creates enormous problems for the management of 1 or 2 aircraft. Simplification of the regulation is required.
ITALY	ENAC 1: ENAC consider that new organisations could be created under this regulation as CAMOs, apart from those already existing today which are mostly linked to an air-club or aerial work operators already approved as CAMOs.
SWEDEN	Nil
POLAND	Nil

GERMANY	VDS1: For the manufacturers this regulation brings a new and additional burden to apply for subpart G organisation. This will have a substantial negative economic impact due to additional workload and costs.
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ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: Agreed there will be an additional charge, which will need to be paid by owners for this activity. Current practise is to include this work as part of a maintenance service carried out by a maintenance organisation. Therefore the cost is covered within the cost of performing maintenance, the two charges may now be separate and transparent but it is believed the overall costs will rise. RAC & BBGA & AOPA 1: This comment is not easily quantified as it depends on the charges agreed by the authority. There is likely to be an economic impact on the industry resulting from a need to introduce more formal procedures and to meet increased CAA charges reflecting additional time to administer the approval.
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FRANCE	Industry & FFA: An assessment would need to be made on the cost of a combined Subpart F & G approval. This information is not available at the time of the assessment FFVV – Impact could be reduced if FFVV association becomes a Subpart G organisation. Otherwise this will have a significant impact.
ITALY	ENAC 1: Accepted
SWEDEN	Nil
POLAND	Nil
GERMANY	VDS: Today manufacturers perform maintenance on gliders under national law. However there is no obligation for manufacturers to be Subpart G approved.

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: We cannot easily predict industry participation in Part G approvals as Subpart (4)(e) says that an owner may contract such organisations. There is therefore a significant risk that many private aircraft owners will present their aircraft to the FRENCH DGAC/GSAC for the issue of the ARC every 12 months.
ITALY	ENAC 1: ENAC was of the opinion that Part M will offer a real advantage for the maintenance companies that will apply for Subpart F and G.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: An owner is obliged to go to a Subpart G organisation for the issue or recommendation of an ARC annually. Only in exceptional circumstances, where there are few Subpart G organisations, will there be an effect on the DGAC as this may produce an increase in the annual workload.
ITALY	ENAC 1: Agreed
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	AOPA: Requires a combined and simple F & G regulation.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Ref AMC material: appendix IX. In order to better define the scope of work for a Subpart G organisation, it is felt that application form should be more specific, similar to the scope set out in form 2 for Subpart F organisations (see appendix IX)
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	AOPA: This recommendation would be difficult to implement, as the regulations have to encompass all aircraft operations, commercial and non-commercial.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: The requirements for a Subpart G scope of work application need only to specify the aircraft model and registration.
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION**Paragraph Reference: M.A.703 Extent of Approval****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	DGAC: This regulation may create difficulties for large aircraft operated by EU operators. The French DGAC relies on the rules and procedures of the local authority, by means of delegation of oversight. At this date no 83bis approvals have been signed.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: In accordance with EU regulation 2042/2003 article1(3) these aircraft are considered to be operated as commercial air transport and have not been assessed as part of this RIA.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	AOPA 1: Most owners or groups will not use a Subpart G organisation due the extra administration burden and cost. PFA 1: The introduction of a Subpart G organisation will radically increase the regulatory costs of maintaining an aircraft unless it is possible for a one-man organisation to be approved for Subpart F and G.
FRANCE	Nil

ITALY	AOPA 1: Today there are around 70 air clubs and a further 400 private aircraft not owned or operated by aero clubs. Organisations similar to CAMO (privilege equivalent to M.A.711 (a) only) already exist in Italy. Most of them are located in air-clubs. Because air-clubs receive support from local administrations and have special fiscal privileges, they are constrained from allowing their mechanics from undertaking CAM tasks except on their own club's aircraft. When real costs are transferred to fees charged to aircraft owners, fees for CAM tasks will be more expensive.
SWEDEN	SCAA: In principle no problem with the concept of Subpart G and the Subpart I, Airworthiness Review Certificate. However, unless Subpart G one-man organisation have the privilege under M.A. 711b) 2 to make a recommendation for the airworthiness review to the Member State of Registry who then will issue the ARC, we foresee great difficulties for aircraft owners and operators of small aeroplanes with economic and other effects that are difficult to quantify.
POLAND	Nil
GERMANY	VdS: Existing systems of releasing CS-22 aircraft back into service - i.e. issuing an ARC – should be preserved, otherwise the effects on owner/ operator/ organisation would be negative in respect of financial and social impact. In particular, the need to get every ARC direct from the competent authority, instead of from the approved inspector, will impose additional workload and costs. For the manufacturer, this brings the new and additional burden to apply to become a Subpart G organisation in order to inspect for continuing airworthiness CS-22craft out of own production. This will have a substantial negative economic impact due to additional workload and costs.

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	<p>AOPA 1: The cost of the Subpart G approval is unknown. However the administration burden will require additional time depending on the size and complexity of an organisation. It is expected that existing M3 would have an increase of approximately 20% in their administration costs.</p> <p>PFA 1: It is possible to have a one-man Subpart F and G organisation without M.A.711 (b) 2 privilege. This is not considered a significant impact.</p>
FRANCE	Nil
ITALY	AOPA 1: This is particular situation in Italy. The cost already exist, but new Subpart G organisation will not be offering reduced charges as is the case in air clubs. If air clubs are not allowed to provide Subpart G services to private operators this may have an impact unless an open market system is established.
SWEDEN	SCAA : This rule will cause an economic burden on the current one-man operation unless a Subpart F organisation can be combined with a Subpart G together with M.A.711 (b)2 privilege. This burden is reduced if recommended amendment to M.A.712(f) is adopted.
POLAND	Nil
GERMANY	VdS: Refer to comment made in M.A.702 Economic impact assessment.

SOCIAL IMPACT COMMENTS

UK	<p>AOPA 2: Make it simple to have combined F & G. Need to make sure enough is done to encourage people to apply.</p> <p>Although it seems more jobs will be created at the expense of owners the safety case for Subpart G needs to be properly made.</p> <p>BBGA 1: UK engineer license holders will have seen significant social impact on heir ability to function as per the M3/section L system. It is essential that a one-man Subpart F organisation can hold a Subpart G approval.</p>
FRANCE	FFVV: There will be a loss of employment of engineers and instructors
ITALY	Nil

SWEDEN	<p>SCAA 1: Sweden turned over to a system- oriented airworthiness renewal system in the mid 1970-ties and has relied upon declarations from maintenance organisations and individual licensed engineers for the renewal of Airworthiness certificates complemented by random inspections by SCAA inspectors.</p> <p>In the SCAA system, one-man organisations (licensed maintenance engineers) have the privilege to issue yearly maintenance declarations/reports to recommend renewal of the Airworthiness Certificate. The majority of renewals for privately owned small aircraft are based these reports.</p> <p>We are of the opinion that a Subpart F one-man organisation should have the privilege under M.A. 711(b) 2 to make a recommendation to the Member State of Registry. In this case the quality system requirement should be replaced by an organisational review.</p>
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	<p>AOPA 2: Refer to M.A.702 Economic France assessment.</p> <p>Data for substantiating this comment not available. No negative social impact.</p> <p>BBGA 1: Subject to compliance with the rules a one-man Subpart F can hold a Subpart G approval. However in order to have the privilege of issuing or recommending ARC's we would need to be able to sub-contract the independent audit function of a quality system. (See recommendation)</p>
FRANCE	There is no apparent reason to lose voluntary employment of engineers and instructors.
ITALY	Nil

SWEDEN	SCAA 1: This is a reoccurring comment in one form or another the question of who can make a report to recommend the issue of a ARC for small light aircraft, balloons and gliders needs careful discussion. (See recommendation)
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Economic and Social recommendation

SCAA 1 & AOPA: It should be possible, in the case of a one man Subpart G organisation limited to small aircraft, (including balloons and gliders) with the M.A.711 (b) privilege, to sub-contract the quality audit task. (See recommendation M.A.712 (f))

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION

Paragraph Reference: **M.A.704 Continuing Airworthiness Management Exposition (CAME)**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil
EAS/EGU	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA: For non-commercial aircraft, maintenance data are at present provided by the Part-

	<p>145 or national approved maintenance organisation. If each owner has to have his own approved data, this would create additional costs for the owner.</p> <p>VdS: If there is a requirement to write complete new expositions, this would create a new financial burden. The need to get a separate approval with associated additional manuals, personnel procedures etc offers no increase in flight safety but results in a substantial financial burden upon the industry. This would be minimised if the Subpart G manual was an extension of the Subpart F manual rather than a completely new manual</p> <p>EAS: This is a burden to issue additional manual for the management of continuing airworthiness of simple design aircraft.</p>
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ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	<p>LBA: Misunderstanding of the regulation. The owner is not required to hold his own approved data unless he is managing his own aircraft airworthiness.</p> <p>VdS: It is possible to combine a MOM manual with a M.A.704 CAME, ref to AMC M.A.704. Impact is minimal.</p> <p>EAS: See VdS</p>

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	<p>DGAC: The implementation of this regulation is not facilitated by the fact that a strict application of the framework of the manual does not seem to satisfy fully the requirement, especially on the procedures to be set to ensure the tasks required by M.A.708(b)(4) to (b)(8) (planning/coordination of scheduled maintenance, management of life limited parts, maintenance data...)</p>
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: Recommendation will be made to cross-check data from the CAME in Appendix V

	and the requirement in M.A.708.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Other recommendation

France: DGAC: Cross-check data from the CAME in Appendix V and the requirement in M.A.708.

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION**Paragraph Reference: M.A.705 Facilities****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA: This requirement is unlikely to cause a problem, because the national regulation already requires equivalent facilities

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Agreed

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: We foresee that not all maintenance engineers accommodation will be eligible for Subpart G approvals i.e. not meeting the M.A.705 Facilities requirement. The social effects are difficult to quantify. SAOPA 1: A subpart G organisation for private or club owned airplanes should not be implemented. Service personnel as it is presently will be sufficient.

POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: This is not considered a significant impact. SAOPA 1: The use of a Subpart G organisation is optional for private or club owned aircraft, except for the recommendation or issue of an ARC.
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: **G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION**
 Paragraph Reference: **M.A.706 Personnel Requirements**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	FFA: This requires additional staff and therefore additional costs. FFVV: Direct costs will impact on hourly costs. There will be difficulties of recruitment for

	organisations that only operate light aircraft, since qualified engineers will gravitate towards the larger companies.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: The costs of setting up a subpart G organisation will be high for the aerial work sector (e.g. crop spraying)
GERMANY	LBA: M.A.706 (e): For non-commercial aircraft, Part-145 management personnel are today the same as future "Part-M Subpart G" personnel. LBA plan to formally accept this in the future. EGU: Particularly in small countries such as Belgium, Denmark and Norway, the National Gliding Bodies, which have a continuing airworthiness management system based on voluntary people, will have to engage paid staff. This will dramatically affect the cost of maintenance.

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	FFA: There is a minimum impact in that most of the activities are being carried out today by existing personnel. However in order to meet the requirement of M.A.707, it is possible that additional personnel would be needed. FFVV: This question is more related to Part 66 licences than to Part M.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Cost would be minimized if the subpart F and G organisations are combined.
GERMANY	LBA: Agreed. EGU: Appropriate qualified voluntary staff will be acceptable as subpart G personnel. The impact would be minimal.

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: This approval may create a risk of competition between F and F+G organisations. The F+G organisations create a permanent dialogue between airworthiness management staff and maintenance personnel.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Necessary background or academic knowledge in the Regulation to achieve the qualifications described under M.A.706 (c) is not defined. In order to harmonise this requirement, it should be defined in the Regulation, as it is in 145.A.30 b) (with less stringent requirement).
GERMANY	LBA: M.A.706 (e): For non-commercial aircraft, Part-145 management personnel are today the same as future "Part-M Subpart G" personnel. LBA plan to formally accept this in the future.

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: Competition can be positive as well as negative, and the overall impact is difficult to quantify.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Assessed as not necessary.
GERMANY	Agreed.

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil

POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATIONParagraph Reference: **M.A.707 Airworthiness Review Staff****SAFETY IMPACT COMMENTS**

UK	BGA 1: There is no safety case identified to require a Part 66 license or equivalent to carry out an airworthiness review of a glider. It is more appropriate to have practical experience of continuing airworthiness.
FRANCE	
ITALY	ENAC 1: Related to airworthiness review staff in CAMOs, ENAC has no experience on how to assess whether each airworthiness review staff can work without suffering external pressure, so no ARCS are issued without all guarantees of airworthiness. ENAC 2: (Ref M.A.707 and 66.B.500) In order to have a more powerful legal support, ENAC will like to see stated in the regulation the situations under which the authority may limit or suspend AML privileges for inappropriate use of their duties as continuing airworthiness review staff. (Similarly to 66.B.500)
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS1: for the light aircraft industry, there are very few Part 66 licensed engineers. Generally, these engineers are licensed under national requirements (BCAR Section L in the UK) for light aircraft, or are approved by NGB organisations in the case of gliders. This may lead to safety problem.

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	BGA 1: There is no requirement to hold a Part 66 license when performing an airworthiness review on gliders. Assessed as not a significant impact.
FRANCE	Nil
ITALY	ENAC 1: We are unable to assess the concern of the Italian authority ENAC 2:- Agree that there is risk. However it is outside of this RIA.
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS1: When the present certifying staff convert their national licenses to Part 66 licenses, this risk will be minimized.

ECONOMIC IMPACT COMMENTS

UK	CAA 2: The cost of recruiting staff with the necessary qualifications will add to the cost burden. PFA 1: There will be significant set up costs and manpower requirements for a one-man organisation.
FRANCE	FFA: The criteria and formal training are difficult for the small organisations associated with light aircraft; the present UEA and AEA are already involved in such continuing maintenance management without any approval for this. The qualification of staff in associations for such an approval may imply the need to assign a person for the

	management of the whole approval and of the continuing maintenance management. This represents a significant cost. FFVV: There will be difficulty recruiting those with 5 years experience. There will be a diminution in activity and an increase in costs.
ITALY	ENAC: No adverse impact on the ENAC. The authority will no longer be directly involved in every aircraft C of A renewal. This will produce cost savings, balancing additional costs related to the implementation of other elements of Part M (preparation of new internal procedures, changes in existing national regulations, personnel training, etc)
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA: The five year limitation may not be fulfilled by higher qualified staff (university degree or technical engineer), which must have three years under national law to get the necessary license. This will only be a case-by-case problem, because the latest licenses under national law will be issued for aircraft below 5700 kg on 28th September 2006. VdS: The need to train additional staff with even higher qualification requirements will have a substantial negative financial impact upon the industry. EAS: The same issue arises as was raised under M.A. 606, in that sailplane technicians (and their equivalents) do not normally have JAR (IR Part) 66 certificates /licences.

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 2 & PFA 1: The impact on owners/operators of balloons and gliders seems to be excessive as there will be an increase in staff costs to the industry. It is believed that aviation activities such as balloons and gliders do not require responsible persons to hold the experience and qualifications specified in MA 707. (See recommendations) There will be a significant impact in terms of employing qualified airworthiness review staff if the recommendation is not accepted.
FRANCE	FFA: The formal aeronautical maintenance training needs to be clarified in the AMC Material. See recommendation. FFVV: There is a risk of increased charges from industry. However this increase may be offset depending on a reduction of the DGAC charges.
ITALY	Agree
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA: The airworthiness review staff are not expected to be at the minimum experience level required to hold a Part 66 license. They are expected to hold a senior position within the organisation. VDS: This is a new function but there is no obligation to apply for subpart G approval. EAS: There is no requirement for a Part 66 license for a sailplane technician.

SOCIAL IMPACT COMMENTS

UK	CAA 3: The stipulated qualifications will be difficult to meet in some instances. In particular the 5-year criteria and formal training may be difficult for the small organisations associated with light aircraft. BBGA 1: We believe a Part 66 license plus experience/OJT are the requirements for staff to perform an airworthiness review.
FRANCE	DGAC: The difficult point to solve is: how can the staff be trained and qualified for a job which has been the authority's responsibility for a long time? AOPA: Small or non-profit organisations are unable to comply. FFA: Impossible for small organisations to comply. FFVV: Competent people who do not have the required 5 years experience will be barred from this activity.

	<p>AOPA: 707(a)(2) needs clarification as the possibility of a pilot holding a sufficient qualification may be questioned. The criteria of qualification for lower than 2T aircraft are too restrictive.</p> <p>CFDT: The stipulated qualifications will be difficult to meet in some instances. There is a risk of drift in the implementation of the regulation as there is a similar drift in the marine sector.</p>
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: There is a concern there are no people today in industry to perform those tasks properly in an organisation since these tasks have traditionally been carried out by the authority. Necessary training and experienced personnel will be difficult to get.

GERMANY	<p>VdS: The requirements for airworthiness review staff are much too stringent and would virtually stop gliding in wide areas. In particular, the minimum requirements under M.A. 707 (a) cannot be fulfilled by the thousands of inspectors working on an unpaid voluntary basis, who have been proven to undertake good and safe work</p> <p>EAS1: It is unacceptable to require a Part 66 licensed engineer to carry out the airworthiness review of gliders.</p> <p>EGU: The requirement for a Part 66 licensed engineer to conduct the airworthiness review is overly burdensome for the light aircraft industry and it might be difficult to find any.</p>
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SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	<p>CAA 3: The current requirements for nominated persons for a BCAR A8-15 (M3) approval are similar therefore it is not considered to be a significant impact.</p> <p>BBGA 1: As above the airworthiness review staff requirements are similar to current M3 nominated engineer requirements therefore this is not considered a significant impact.</p>
FRANCE	<p>DGAC: It is believed that there are competent staff in industry, capable of carrying out these duties. The risk is that initially there would be insufficient staff to take over all of the duties.</p> <p>AOPA1- FFA: There is a risk that non-profit organisations would be unable to comply if they seek additional ARC privilege.</p> <p>FFVV: Since this activity is performed today by the authority and not by staff of the organisation, the impact is minimum.</p> <p>AOPA2: There is minimal impact since this activity is not carried out by the pilots today. See recommendation below.</p> <p>CFDT: this issue cannot be assessed in this RIA.</p>
ITALY	Nil
SWEDEN	Nil
POLAND	Refer to the French DGAC assessment.
GERMANY	<p>VDS&EAS: See UK impact assessment.</p> <p>See recommendation regarding airworthiness review staff qualification for gliders.</p> <p>EGU: The impact could be significant for gliders unless the recommendation made in M.A.707 is accepted. For light aircraft the impact is also minimal as review staff may be assisted by a Part 66 qualified person maintaining the aircraft. (Ref M.A.710(b))</p>

OTHER IMPACT COMMENTS

UK	CAA 4: With regard to Hot-air Balloons, the paragraph requires an appropriate Part-66 licence or an aeronautical degree as the qualification requirements to carry out
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	airworthiness reviews. Currently Part-66 does not apply to Hot-Air Balloons and therefore this Regulation may be difficult to comply with unless “ an appropriate equivalent qualification” to Part-66 is acceptable. BGA 2: An explanation of « a Part 66 Licence with OJT – or equivalent” is needed.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 4 & BGA 2: The impact on owners/operators of balloons and gliders seems to be excessive. It is believed that aviation activities such as balloons and gliders do not require responsible persons to hold the experience and qualifications specified in MA 707. (See recommendations)
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Economic, Other & Social recommendation	
CAA 1: – Rule change insert new M.A.707 Para (b) as follows:- “(b) Notwithstanding MA 707 (a), for gliders and balloons, in any cases of non-compliance with this paragraph the applicant shall have appropriate airworthiness review staff for the issue of M.A.Subpart I airworthiness review certificates or recommendations that have acquired:	
	<ol style="list-style-type: none"> 1. at least 5 years experience in continuing airworthiness and 2. maintenance qualifications acceptable to the approved organisations or an aeronautical degree or equivalent,and 3. training on the types of aircraft operated and 4. a detailed knowledge of Part M and 5. a position within the approved organisation with appropriate responsibilities
M.A 707 (b), (c), (d) & (e) should be renumbered M.A 707 (c), (d), (e) & (f)	
France : FFA – AMC material required to be developed for M.A.707(a) regarding the formal aeronautical maintenance training requirements.	

Sub Part: **G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION**

Paragraph Reference: **M.A.708 Continuing Airworthiness Management**

SAFETY IMPACT COMMENTS

UK	CAA 1: Paragraph M.A.708 requires a management organisation to “ensure” continued airworthiness. This will be difficult to enforce on the private owner, unless the aircraft is in the Large aircraft or Commercial Air Transport category.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Current regulation does not require authority approval of maintenance programmes in all cases. Paragraphs M.A.708 b1) and b2) of the regulation is understood as a positive safety impact.
GERMANY	LBA: the repair designs are not described by any manufacturer manual for simple design aircraft. It should be possible to refer to a European equivalent of AC 43-13. This would facilitate the design of repairs.

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: This comment is not considered relevant as this paragraph refers to aircraft managed by contract. Owner's responsibilities are specified in M.A.201. (Not considered a significant impact)
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: agreed.
GERMANY	LBA: Accepted as a practical recommendation which would require the development of a European AC. Impact is that if the recommendation is not accepted there would be an inconsistent standard of repair designs for this class of aircraft.

ECONOMIC IMPACT COMMENTS

UK	CAA 1: In the absence of a standard maintenance programme such as the UK's LAMS the cost of producing and maintaining individual AMPs will be very costly both to the industry and the regulators. PFA 1: There will be a cost associated with a Subpart F carrying out maintenance work, followed by a Subpart G covering the same ground, unless it is straightforward to combine one-man F and G approvals.
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA: There will be a significant increase in workload to approve maintenance programs for each aircraft, this is not done today for privately operated small aircraft.
POLAND	CAO: This will create additional work to develop maintenance programmes in the context of limitations on staff numbers. This would be mitigated if the manufacturers' manual, as approved by the competent authority, could be used as the basis.
GERMANY	LBA: The requirement for issuing a maintenance programme and have it approved per tail number will raise a major problem of staff not sufficient in number. In Germany the maintenance of light aircraft is carried out in reference to the manufacturer manual. VdS: The requirement for an individual inspector to develop a whole inspection/maintenance programme would have a serious financial and social impact, as would the requirement for approval by the competent authority for each individual maintenance programme for CS-22 aircraft (18,000 -20,000 in Europe).

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA1: No impact - AMC M.A.302 (c) 2. allows the use of LAMS in the UK PFA1: No impact - The commenter has misunderstood the tasks associated with each approval i.e. F approval for performance of maintenance and G approval for management of maintenance
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA- There is a significant increase in workload for industry and the authority in approving each individual maintenance programme. This may be offset by the production of a generic maintenance programme for light aircraft such as the UK LAMS programme or the acceptance of the manufacturer's programme when it is available. See recommendation.
POLAND	CAO – Refer to the Swedish assessment and recommendation.
GERMANY	LBA and VDS: refer to the Swedish assessment and recommendation.

SOCIAL IMPACT COMMENTS

UK	CAA 1: Management of this organisation is complex and it is unlikely an owner could achieve it; therefore the impact is to force owners to subpart G organisations.
FRANCE	Nil
ITALY	Nil

SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: Owners can still manage the continuing airworthiness of their aircraft without going to a Subpart G organisation. This is not considered a significant impact.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: There is a need for further guidance material to define the content of maintenance programs so that all Member States have the same ambition level for the approvals. Generic programs must be possible, especially for non-complex small aeroplanes, gliders and balloons. (SCAA 2) - The present AMC material for M.A.302 is written basically with the commercial aviation aspects in mind. A separate AMC for small aeroplanes, gliders and balloon should be developed.
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: No impact. Guidance material is available as AMC M.A.302 and Appendix I to AMC M.A.302. Also generic maintenance programmes are possible for light aircraft, balloons and gliders, see AMC M.A.302(c) 2. SCAA 2: No significant impact. The recommendation in M.A.708 Economic covers this comment.
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Safety recommendation

LBA: – A European standard for repair of simple design aircraft is required.

Economic recommendation

LBA: A generic maintenance programme should be developed by EASA for light simple design aircraft.

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION

Paragraph Reference: **M.A.709 Documentation**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA: Holding the data for modification and repairs in accordance with Part-21 is more stringent than the national requirements for non-commercial used aircraft. VDS: there will be some difficulties for small aviation to ensure that M.A.709 is respected

	in terms of data required by M.A.401
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SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil

GERMANY	<p>LBA: There will be an impact during the transition period where the manufacturer does not produce repair data. This would be minimised if the safety recommendation in M.A.708 is adopted.</p> <p>VDS: The impact is significant on those aircraft that are not supported by a TC holder and some vintage aircraft. AMC to M.A.401 should clarify the requirement for maintenance data when there is no TC holder.</p>
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ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Safety recommendation

LBA & VDS: It is recommended that AMC material is produced to clarify the requirement in M.A.401 for maintenance data when there is no TC holder supporting an aircraft.

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION

Paragraph Reference: **M.A.710 Airworthiness Review**

SAFETY IMPACT COMMENTS

UK	BGA 1: For gliders the BGA favours the continuation of an annual airworthiness review co-incident with annual maintenance check as in its current system.
FRANCE	FFVV: Does not bring more safety.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO1: M.A.710(a)10: Many A/C used in General Aviation today in Poland can not comply with this requirement. CAO2: It is felt necessary to create a template for the recommendation of an ARC to better define the tasks to be accomplished during an airworthiness review as described in AMC 901(d). If this is not the case Authority could formally issue the ARC without the proper knowledge of the result of the airworthiness review.
GERMANY	LBA: No significant change, because Airworthiness Review is done in Germany by approved organisation every year. Industry: Many vintage aircraft do not have flight manuals therefore it would be impossible to carry out an airworthiness review of the type in reference to the flight manual for this class of aircraft.

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	BGA 1: This is the same as Part M Subpart I requirements therefore there should be no additional impact.
FRANCE	FFVV: The impact is minimal as the objective of Part M is to harmonise the gliding community without reducing safety.
ITALY	Nil
SWEDEN	Nil
POLAND	CAO1: This is a particular problem for all accession states that operate former Soviet design aircraft. The impact will be that these states will not be able to comply with M.A.710 until EASA (Part 21) accepts the type design. CAO2: The impact is minimal but a standard form of ARC recommendation would help with standardisation. See recommendation.
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	FFVV: This brings risk of increased costs, although there will be no increase in costs provided agencies do not put up their charges.

ITALY	IBAA 1: Ref M.A.710.(e) & M.A.901 There is a fear from the industry that performing "airworthiness reviews" and "issuing ARCs" could be more expensive than today's reissue of C of A by the authority (with current fees probably under real costs). ENAC: System envisaged by Part M for aircraft not in a controlled environment (Airworthiness Review every year) may result in or be perceived as worsening in terms of costs (costs for issuance of the recommendation by the Subpart G organisation and for the issuance of the ARC by the Authority) and workload especially for aircraft privately used.
	AOPA: The present Italian situation appears more appealing, i.e. the AAR is basically issued for three years, and does not need to be extended to three years following a request each year. This will cause unnecessary workload and costs for all concerned.
SWEDEN	SCAA: No effect except for gliders, where at present the airworthiness review is only required every 5 years.
POLAND	CAO: Charges made by a Subpart G organisation are likely to be higher than those made by the authority (the extent of the difference is unknown)
GERMANY	LBA: No significant change because, in Germany, the Airworthiness Review is done every year by approved organisation. However, since the ARC may be issued by the regulatory authority, this may have an impact on LBA costs. Since it is not possible to estimate how many organisations will switch to LBA certification, or the likely level of charges, the extent of this impact cannot be estimated.

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	FFVV: The impact is dependant on the DGAC and industry charges, which are not available at this time.
ITALY	IBAA 1& ENAC: There is a risk that the future charge for the issue of an ARC by industry will be more than the current charge for a C of A renewal by ENAC. This will depend on the competitive environment within the aviation industry. AOPA: The impact will be minimal if the aircraft are in a controlled environment.
SWEDEN	SCAA: The impact will be an increase of 66% in the cost of C of A validity if the gliders are in a controlled environment. No recommendations are made, as this impact is limited to Sweden.
POLAND	CAO: The impact is dependant on the CAO and industry charges, which are not available at this time.
GERMANY	LBA: The impact is minimal on the LBA costs although there may be additional transitional costs. The cost to industry could be reduced by accepting the associations as Subpart G approved organisations..

SOCIAL IMPACT COMMENTS

UK	CAA 1: This may require additional staff and therefore additional costs Service standards & turnaround times may have to be considered in order allow for the impact of this.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: This is not considered a significant impact
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	LHT: M.A.710(b) requires that a physical survey of the aircraft is carried out. This could be done during a routine check from the maintenance programme and be carried out by the subpart F organisation.

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	LHT: There is no impact, as this task is not carried out by industry today. The content and purpose of the physical survey and a maintenance check are different tasks.

RECOMMENDATIONS

Safety recommendation

CAO: It is recommended that an appendix to AMC M.A.901 is produced as a standard template for an ARC recommendation.

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION

Paragraph Reference: **M.A.711 Privileges**

1

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: Some subpart G organisation may not undertake airworthiness management and review of vintage aircraft that are not excluded by annexe II of the basic regulation. This poses a risk of aircraft not being covered by any organisation.
ITALY	ENAC 1: ENAC advised that the continuing aircraft airworthiness over sight was traditionally a responsibility of ENAC. New privileges will be given to private organisations and cultural changes may need to enable the new system to work safely.
SWEDEN	Nil
POLAND	CAO: is sceptical of approving Subpart G organisations to be able to issue ARCs. This as a safety issue: Initially, Polish safeguards will be weakened. Only when the CAO is convinced that subpart G organisations are competent, will they be allowed to issue an ARC
GERMANY	LBA: The non-commercial used aircraft are not listed in the exposition by tail number so far. This is an additional requirement. It is expected that many organisation will ask for this privilege. No problems are expected.

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: The continuing airworthiness of these aircraft is usually performed by the owner in an uncontrolled environment and the C of A is valid for one year therefore the impact will be minimal since there will be no change under Part M.
ITALY	ENAC 1: There is a significant safety risk during the transition period which could be progressively reduced by appropriately managed oversight by the authority.
SWEDEN	Nil
POLAND	CAO: Agreed

GERMANY	Nil
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ECONOMIC IMPACT COMMENTS

UK	PFA 1: The additional requirement for a quality assurance system when approved for the privilege of recommending or issuing ARC's will incur extra costs.
FRANCE	<p>Authority: There is a fear that there will be a category of aircraft which will not be in a controlled environment because some organisations will not have the 711(b) extension for these aircraft.</p> <p>SNIPAG: Few organisations are interested in such privilege. There is a risk of incurring high costs.</p> <p>FFA: Some small organisations would not be in a position to issue an airworthiness review certificate.</p> <p>AOPA: Such privilege needs investments in documents, material etc. Risk of non-profitability.</p> <p>FFVV: may need to apply for such approval at the level of the Federation</p>
ITALY	<p>ENAC: No impact on the authority. The authority anticipates that the majority of Continuing Airworthiness Management Organisations will apply for additional privilege of issuing or recommending ARC in order to properly catch the main direct and indirect benefits offered by the new system and to better compete in the market.</p> <p>AOPA: AOPA members are unlikely to be applying for this privilege.</p>
SWEDEN	SCAA: We foresee that many one-man organisations will apply for approval, including the privilege to recommend the ARC issuance. If the regulation is not changed in this respect we foresee great problems for private owners and aero clubs, especially those located in remote areas of Sweden.
POLAND	Nil
GERMANY	<p>LBA: It is anticipated that many organisations will request this privilege. There will be an impact on the LBA due to the need to undertake a check on maintenance programme documentation by registration number.</p> <p>VDS1: VDS thinks that the issuance of ARC by the authority in case of uncontrolled environment for gliders may cause obstruction and delays at the LBA.</p> <p>VDS2: VDS claims the possibility that manufacturers may issue ARC and renew them without approval from the authority.</p>

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	PFA 1: This comment is correct but difficult to assess, as there are no existing organisations that may issue airworthiness review certificates. An equivalent is the Certificate of Airworthiness renewal process, which incurs a charge from the CAA. The new CAA charging scheme is not known however it is expected that the charge will be similar if carried out by a Subpart G instead of the CAA. See recommendation made in M.A.712 (f).
FRANCE	<p>DGAC & SNIPAG: There is a risk that the owners will have difficulty in finding appropriate organisations with the ARC privilege. However this concerns a limited number of aircraft. The impact would be on the authority to provide an ARC annually.</p> <p>FFA: Agreed. Work may be transferred to appropriate organisations with economic consequences.</p> <p>AOPA: Agreed.</p> <p>FFVV: There will be an impact, which is difficult to assess at this time if the federation is given Subpart G approval. This could be positive or negative depending on the organisational structure.</p>
ITALY	<p>ENAC 1: Agreed</p> <p>AOPA: This will have minimal impact where the owner manages the continuing airworthiness of his aircraft. This represents no change from the current situation.</p>

SWEDEN	SCAA: There will be a significant impact which will be reduced if the recommendation made in M.A.712 (f) is accepted.
POLAND	Nil
GERMANY	LBA: See assessment and recommendation made in M.A.708. VDS1: We are unable to assess the effect of processing a recommendation for the issue of an ARC by the LBA. VDS2: There is no impact as the manufacturers are not approved today therefore Part M will not change the current system.

SOCIAL IMPACT COMMENTS

UK	CAA 1: M.A.711(c) requires an organisation to be registered to have these privileges. This would effectively preclude a "sole trader" from holding this approval. BBGA 1: Unless a Subpart G can gain the privilege of this paragraph there is no point having a Subpart G approval.
FRANCE	FFA: Risk of competition between the organisations with '711(b) privilege and those without 711(b) privilege.
ITALY	AOPA 1: Private aviation could diminish if continuing airworthiness is not performed pilot-owners.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: The assessment is that a word change is necessary to be compatible with (EC) No 2042/2003 article 2 Para i. as this would restrict unregistered individuals operating as "sole traders" from being approved as a Subpart G organisation. (See recommendation) BBGA 1: This comment is an opinion and has not been assessed.
FRANCE	FFA: Agreed there is a high risk that there will be competition this can be both positive for owners and negative for some industry.
ITALY	AOPA 1: No impact. It is possible for pilot-owners to continue to perform Continuing airworthiness tasks.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	VDS2: The manufacturers having already a Part 21G organisation, when they are also subpart F approved, have already a well structured organisation which include a quality system, therefore it would not be a great challenge to obtain a subpart G approval.

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	VDS: Agreed

RECOMMENDATIONS

Social recommendation

CAA 1: Rule change to M.A.711(c) as follows: -

(c) An organisation shall be **located** in one of the Member States to be granted the privilege pursuant to paragraph (b).

Economic recommendation

See recommendation under M.A.708 and M.A.712 (f)

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATIONParagraph Reference: **M.A.712 Quality System****SAFETY IMPACT COMMENTS**

UK	CAA 1: In respect of aircraft below 2730 kgs it is onerous to require organisations that have privileges for ARC in M.A. 711 (b) to have a formal quality system. If the approval provides a satisfactory level of safety for continuing airworthiness management without a formal quality system then it should be equally satisfactory for the conduct of airworthiness reviews. BGA 1: The increase cost burden and workload may be acceptable to the gliding association in terms of safety and reduced risk, providing the quality system is appropriate.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Ref AMC 201 h)/1/2: It is felt necessary to define the extent to which and under what criteria CAM tasks may be subcontracted to other organisations. Responsibility in this case should be transferred or clearly stated otherwise.
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1& BGA 1: This is a common comment throughout the whole assessment of Part M. In accordance with M.A. 711 (a) an organisation can be approved to manage the continuing airworthiness of aircraft, which is a key function in the airworthiness assurance process. We recognise that if a Subpart G organisation can satisfactorily manage the continuing airworthiness without having to have a formal quality system then it should be equally satisfactory to conduct airworthiness reviews for the less complex general aviation aircraft without such a system. There would be a significant impact on the light aircraft industry if the recommendation to change M.A.712(f) is not accepted. See recommendation.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: There is confusion as to the use of appendix II to M.A.201(h) 1. This would be clarified if it referred to all Subpart G sub-contracting in the text and not just operators.
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	AOPA & PFA & RAC 1: A quality system will have to be ultimately paid for by the owner there is an adverse economic impact. BGA 1: The increase cost burden and workload may be acceptable to the gliding association in terms of safety and reduced risk, providing the quality system is appropriate.
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FRANCE	<p>DGAC: There is a risk of concentration of activity on the solely 'Subpart I approved' organisations, and also that all aircraft may not be covered by the scope of such I approved organisations.</p> <p>AOPA: Since the request for a quality system creates difficulty, then it is proposed to grant such privilege without such a quality system to the review of simple design aircraft</p> <p>FFA: The federation has experience of quality systems such as ISO 9000, and this has needed the presence of additional staff, which eliminated the small organisations.</p> <p>FFVV: Cost increases will be prohibitive for small organisations. There will be a decline in activity.</p>
ITALY	<p>ENAC 1: Quality systems are not required for current CAM Organisations. This will have an economic impact.</p> <p>ENAC: Problems could be associated with establishment of a documented organisational review (which is not formally required for such organisations by national regulations), or establishment of quality system if the additional privilege of issuing or recommending ARC (the sole actual innovative provision in respect of national regulations) is sought by the organisation. In this circumstance, additional costs (one-off and operating) for the organisations may be incurred.</p> <p>AOPA: The requirements foreseen by M.A.712 must not be applied to owner / operator / pilot</p>
SWEDEN	SCAA: A great impact if quality system cannot be substituted by organisational reviews for one-man organisations.
POLAND	Nil
GERMANY	<p>LBA: Under national requirements a comparable quality system is required.</p> <p>(Industry) Even Subpart G organisations that do have privileges granted under M.A. 711 (b) should have the option of replacing the quality system with the performance of organisational reviews on a regular basis.</p>

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	<p>AOPA & PFA & RAC 1: This is a similar comment to CAA 1in safety and subject to the same assessment and safety recommended rule change.</p> <p>BGA This is the same comment as for the safety assessment. See recommendation</p>
FRANCE	<p>DGAC: There is a risk that the majority of work will be captured by the larger Subpart F+G+I organisations, which may not cover all models of aircraft. For aircraft not covered by these large organisations the owners will incur additional positioning expenses.</p> <p>AOPA: There will be additional expense unless the safety recommendation for M.A 712 (f) is accepted.</p> <p>FFA & FFVV: Agreed additional staff will be required unless the safety recommendation made in M.A.712(f) is accepted.</p>
ITALY	<p>ENAC 1 & 2: See France and UK assessment and recommendation.</p> <p>AOPA: See France and UK assessment and recommendation</p>
SWEDEN	SCAA: See France and UK assessment and recommendation
POLAND	Nil
GERMANY	<p>LBA: Agreed</p> <p>Industry: See France and UK assessment and recommendation</p>

SOCIAL IMPACT COMMENTS

UK	CAA 2: Within a Sub part G approved organisation for Hot-air balloons when approved to issue ARC's, it may not be possible to employ quality auditors for the quality system. The Regulation does not appear to allow the application of a small organisation quality audit system similar to that of Part-145, where the auditing may be contracted to a qualified third party auditor. Suggestion is to still require a quality system – but the auditing could be sub-contracted. BBGA 1: For non commercial aircraft a simple review based on a quality system using an external auditor if required is the maximum level this paragraph should require.
FRANCE	FFA: The federation has experience of quality systems such as ISO 9000, and this has needed the presence of additional staff, which eliminated the small organisations. FFVV: There will be a loss of employment in the smaller, more isolated, organisations.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 2 & BBGA 1: This is a similar comment to CAA 1 in safety and subject to the same assessment and safety recommended rule change
FRANCE	FFA & FFVV: See economic assessment response.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS: If a subpart G organisation does not have the privilege to issue an ARC or make a recommendation for airworthiness, such an organisation appears to be of little use, as an ARC is required for the airworthiness certificate to be valid.

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	EAS: The comment is not correct as a subpart G organisation also manages continuing airworthiness. No impact.

RECOMMENDATIONS

Safety and Economic recommendation

CAA 1 & BGA 1 & SCAA 1: A change to the rule is recommended as follows:-

M.A.712 (f) In the case of a small M.A. Subpart G organisation ~~that does not have the privileges granted under M.A.711(b),~~ *when the MA 703 extent of approval does not include aircraft used for commercial air transport or aircraft above 2730kg MTOW or multi-engine helicopters*, the quality system can be replaced by performing organisational reviews on a regular basis.

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION**Paragraph Reference: M.A.713 Changes****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION
Paragraph Reference: M.A.714 Record Keeping

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	SNIPAG: Responsibilities and links between the F, G and operators organisations are not clear: i.e. how can the G organisation get daily flying hours data?
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	SNIPAG: There is a safety risk that a contracted Subpart G organisation is not aware of the latest flying hour status of the aircraft, which could affect AD compliance. A rule change is recommended to add this to Appendix I.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Safety recommendation

This recommendation has been added to Appendix 1

SNIPAG: It is recommended to add the following to paragraph 5.2 of the Rule:-

“10. Inform the approved organisation of the aircraft flying hours on a regular basis”.

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION

Paragraph Reference: **M.A.715 Continued Validity of Approval**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Same as in M.A. 618
SWEDEN	Nil
POLAND	Nil

GERMANY	Nil
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SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Refer to impact assessment in M.A.618.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: Under the Italian national regulations, ENAC re-issues authorisation to maintenance organisation every two-year period rather than given unlimited authorisation. This will have some impact in ENAC internal organisation and procedures as National Aviation Authority.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: It is expected that this will have an initial impact in terms of additional resources, until ENAC reorganise. No long term impact expected.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Polish Authority: Regulation is felt in contradiction between articles M.A.715 and M.B.703 b) when describing the validity of the approval.
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: This is not assessed as a significant issue and needs to be clarified with CAO.
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATIONParagraph Reference: **M.A.716 Findings****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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iii) Sub Part: H CERTIFICATES OF RELEASE TO SERVICE

Paragraph Reference: **M.A.801 Aircraft Certificate of Release to Service**

SAFETY IMPACT COMMENTS

UK	<p>CAA 1: This proposal would permit pilots to certify for a significant number of maintenance tasks. We have a concern that the current JAR FCL syllabus is deficient in airworthiness topics and thus question how competence has been established. We recommend a review of the PPL syllabus.</p> <p>Need to link the competency of pilots to the appendix 8 list of tasks that a pilot can certify.</p> <p>CAA 2: Transferred from M.A.607 (b) - There needs to be acceptance of certifying staff other than Part 66 staff to enable maintenance that is unforeseen to be certified when this occurs at locations outside of the territory of the Member States.</p>
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	<p>CAO: Licensed mechanics under current national regulation considers only A/C log book to register maintenance performed and release the aircraft. The fact of issuing a CRS is considered as safer.</p>
GERMANY	<p>VDS1: In order to avoid unnecessary and non-feasible bureaucratic burden upon gliding operations VdS proposes that after completion of tasks described in the "Operations" chapter of the approved flight manual of the CS-22 aircraft no CRS is needed (this includes the removal and reinstallation of wings on a glider).</p> <p>Those tasks are part of the flight operations and are meant to be conducted by the pilots when trained to this, not by maintenance personnel. Therefore no CRS would be needed to be signed.</p>

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: This RIA will not be reviewing the PPL syllabus. (See M.A.803 recommendation) CAA 2: It is accepted that when an aircraft is unserviceable at locations outside of Member States it must be released to service by appropriately qualified persons. (See M.A.803 recommendation)
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Agreed
GERMANY	VDS1: Agreed this comment supplements the comments and recommendation made in M.A.803.

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	<p>DGAC: The level of qualification requested for a Part 66 License is too high for the small aviation sector. There is a risk that Part 147 organisations may have little interest in the development of type training qualification for small aircraft, so that the authority will need to create a system of examination. If this were the case, there would be cost implications.</p> <p>AOPA: Appendix VIII does not correspond to the reality that pilot owners need to carry out the 50/100 hours check and does not guarantee the competency of the person. It is proposed to open up the rights and require an appropriate training. Such proposal is also applicable to approved organisations. The limit at 5,7 T is not appropriate.</p> <p>FFA: The consequences depend on the level of the requirements of the Part 66 licence. The present level B1.2 is too high, and could lead to the disappearance of 10 to 20% of UEA. It is proposed to use a lower level of qualification, similar to the old B3 level considered some time at the JAA. A Beech 200 and a DR400 cannot be considered in the same category.</p>
ITALY	<p>ENAC 1: Same comments as apply under M.A. 606 & Part 66 A 200 above. Also, in relation to Part 66 licensed personnel, such persons were not envisaged by the current national regulatory system. Therefore a new monitoring system to provide appropriately oversight of maintenance activities performed by those persons needs to be established (e.g. documenting minimum working experience in exercising privileges of their licence, etc.).</p> <p>AOPA: We do not foresee problems with this requirement providing no additional, unnecessary, paperwork burden is imposed.</p>
SWEDEN	SCAA: No change compared to Swedish national system except that presently approved AUB/RSC organisations will have to be surveyed and approved under Subpart F.
POLAND	CAO: At present the pilot owner is not permitted to remedy defects. Under part M he will be able to.
GERMANY	<p>LBA 1: This is an improvement compared to the current situation. Under current rules, release to service by the pilot owner is not required. If an experience person is doing a simple task, the person is allowed to sign for that task, and the task is inspected during the annual review. Now, greater responsibility is placed on the pilot owner.</p> <p>LBA 2: Another problem is ensuring competence of Part 66 licensed personnel. The LBA may not be able to check the individuals experience when they renew their license. (EAS) There will be an impact on pilot owners. This would be mitigated if a task were to be classified as pilot owner task by the aircraft manufacturer (item 32 of appendix VIII).</p>

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	<p>DGAC: There is a significant impact on the light aviation industry by the introduction of Part 66 licenses when there is not a licensing system in place. This has not been assessed as the system is not ICAO compliant.</p> <p>FFA: This comment is accepted. If the Part 66 license is inappropriate there will be cost penalty. However this is not a Part M issue and should be addressed by a Part 66 review.</p> <p>AOPA: Accepted. This would be mitigated if a task were to be classified as a pilot-owner task by the aircraft manufacturer (e.g. Item 32 of Appendix VIII). Also see recommendation in M.A.803.</p>
ITALY	<p>ENAC 1: Agreed</p> <p>AOPA: Agreed</p>
SWEDEN	<p>SCAA: The initial impact will be the cost of producing a new MOM, training and reorganisation.</p> <p>We expect this to be minimal.</p>
POLAND	CAO: Comments accepted. No economic impact
GERMANY	<p>LBA 1: Accepted.</p> <p>LBA 2: This considered a Part 66 standardisation issue and not addressed by this RIA.</p> <p>EAS: Accepted. See recommendation M.A.803.</p>

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	<p>DGAC: The requirement for having 6 months experience within 2 years is a constraint. It is considered that the level of activity is lower than 200 hours a year per aircraft. Then an engineer will need to have 5 aircraft type on contract to keep his licence. And an engineer having 20 gliders and 2 tug aircraft on maintenance will not have the possibility of keeping his licence.</p>
ITALY	<p>ENAC 1: No individuals are allowed today to work by their own. It is uncertain whether this could be the case after the regulation comes in force since no previous experience of individuals working alone in maintenance.</p>
SWEDEN	Nil
POLAND	Nil
GERMANY	<p>LBA: The level of qualification of individual licensed engineers in Germany is lower than required by the Part 66. There will be an impact in the staff of individual engineers for obtaining their licenses for an equivalent scope of activity. For others there may be some restrictions on their 66 licenses.</p>

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	<p>DGAC: This interpretation by the DGAC is not accepted and considered a Part 66 standardisation issue.</p>
ITALY	ENAC 1: This is assessed as a similar comment to ENAC 1 in the economic paragraph.
SWEDEN	Nil
POLAND	Nil
GERMANY	<p>LBA: We are unable to assess the level of impact, as this is a Part 66 issue, the impact level will be determined by the interpretation made by the LBA.</p>

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: Swedish national approved organisations (AUB/RSC) will require Subpart F approval.
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: small impact during initial change over to Part M.
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Safety recommendation

CAA 1: Additional material required for AMC M.A.803 to clarify how a pilot-owner can be trained to carry out maintenance tasks and demonstrate competence.

CAA 2: - Rule change insert a new M.A.801 paragraph (c) as follows: -

M.A.801 (c) - By derogation to M.A.801 (b) in the following unforeseen cases, where an aircraft for which no maintenance organisation approved under this part is contracted, is grounded at a location other than the main base where no appropriate certifying staff is available. The person responsible under M.A.201 (a) may authorise any person with not less than three years maintenance experience and holding a valid national aircraft maintenance licence rated for the aircraft type requiring certification, provided there is no organisation appropriately approved under this Part at that location.

The person responsible under M.A.201 (a) shall:

- 1 obtain and hold in the aircraft records details of the licence held by that person issuing the certification; and
- 2 ensure that any such maintenance that could affect flight safety is rechecked by an appropriately authorised M.A.801(b) person and
- 3 notify the competent authority within thirty days of the issuance of such certification authorisation.

M.A 801 (c), (d), (e) & (f) should be renumbered M.A 801 (d), (e), (f) & (g).

Sub Part: H CERTIFICATES OF RELEASE TO SERVICE**Paragraph Reference: M.A.802 Component Certificates of Release to Service****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: H CERTIFICATES OF RELEASE TO SERVICEParagraph Reference: **M.A.803 Pilot-Owner Authorisation****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	<p>AOPA: There is no rule or guidance for who and how the determination of competence of pilots is to be made. Proposed change to the text of 803(b):</p> <p>“ For any privately operated aircraft of simple design with a MTOM of less than 2730 Kg, glider and balloon, the pilot owner may issue the CRS after an approved training in the category of the aircraft.”</p>
ITALY	See comments in Appendix VIII
SWEDEN	SCAA 1: On the other side we believe that some tasks listed in Appendix VIII are of a complex nature or affecting critical systems (i.e. item 22, replacing fuel lines). An expert panel including representatives from the private flying organisations should further review the Appendix. (In Sweden KSAK/SPAF/Segelflygförbundet)
POLAND	<p>CAO 1: There is a fear that pilots could try to perform maintenance with a wider scope than the scope defined in the regulation (appendix VIII).</p> <p>CAO 2: Ref. AMC M.A.803/3: demonstration of competence of the pilot to perform specific maintenance tasks is not well established. It is felt a safety issue that there is not a process to define these demonstrations.</p> <p>CAO 3: The regulation is not clear</p>
GERMANY	<p>LBA: The German weight limit for pilot owner authorisation is 5.700 kg instead of 2.730kg.</p> <p>In reference to M.A.803(c), the maintenance programme for non-commercial used aircraft is an additional requirement.</p> <p>VDS: It is clear that on simple design aircraft including gliders, some installation of parts are simple (reinstallation of wings after landing in a field) and when described by the manufacturer as not being considered as a maintenance action, then it should be possible for the pilot owner to carry out the task and release the aircraft. M.A.801 and paragraph 32 of Annexe VIII should be modified accordingly.</p> <p>BBAL: Safety will be adversely affected, because of lack of understanding of the requirements of the regulation.</p>

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	AOPA: This is not considered acceptable from a standardisation point of view, as the impact would be significant for other Member States.
ITALY	Nil
SWEDEN	SCAA 1: This Appendix VIII is a concern from a safety perspective and each item should be carefully considered. See recommendation
POLAND	CAO 1: This cannot be assessed as part of this RIA. CAO 2: There could be a safety impact unless the recommendation is accepted. CAO 3: If the rule is not understood this could have a safety impact. The risk will be high unless adequate training is undertaken.
GERMANY	LBA: This is considered to be a safer environment. The tasks will need to be performed by individual licensed engineers or approved organisation at additional cost. VDS: It is considered inappropriate to try to list the activities of Gliders and Balloons together with all other aircraft in appendix VIII. See recommendation. BBAL: If the rule is not understood this could have a safety impact. The risk will be high unless adequate training is undertaken.

ECONOMIC IMPACT COMMENTS

UK	PFA 1: There will be a significant cost increase to owners who currently carry out their own 50 hour scheduled inspection.
FRANCE	
ITALY	AOPA: No problem is foreseen providing the owner/operator/pilot is not required to have a specific approval/permission to perform the pre-flight inspection. The remaining tasks listed in appendix VIII are considered reasonable.
SWEDEN	SCAA 2: Present Swedish regulations allow the pilot/owner to perform scheduled maintenance up to but not including 100 hours inspections. This is not included in Appendix VIII to Part M, which we are of the opinion that it should.
POLAND	Industry: Pilot owners will have to bear the costs of additional inspections that cannot be performed by themselves.
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	PFA 1: The economic impact is not considered significant. However private pilot owners in many Member States have performed this activity for many years without significant incident. See economic recommendation.
FRANCE	Nil
ITALY	AOPA: Accepted
SWEDEN	SCAA 2: There will be a minimal cost impact but this will be further reduced if the economic recommendation is accepted. The common standard throughout the Member States is to allow the pilot owners to perform the 50-hour scheduled inspection. This has been evaluated as an acceptable standard.
POLAND	Industry: The impact is considered to be minimal based on the current system.
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil

SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	<p>CAA 1: The wording to which Pilot-owner maintenance may be applied is not clear. It appears to apply to any privately operated aircraft of simple design with a maximum take-off mass of 2730Kgs but for a balloon and glider there is no operational restriction. Therefore can a balloon operated for the purposes of public transport but not for Commercial Air Transport (which is not applicable to Hot-Air Balloons) be maintained in accordance with the list in Appendix VIII.</p> <p>If this list is not applicable to a public transport balloon. Is there provision within the Sub Part F approved organisation for pilots of public transport balloons to be authorised to conduct maintenance within the scope of the Appendix VIII list?</p> <p>CAA 2: There is no rule or guidance for who and how the determination of competence of pilots is to be made.</p> <p>BGA 1: The scope of appendix VIII pilot/owner maintenance should be wider for gliders.</p>
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	<p>CAA 1: The term "aircraft" applies to balloons and gliders, and "public transport" is not a term used in Part M. Privately operated balloons of simple design with maximum take off mass of 2730kgs can be maintained by the pilot owner in accordance with the Appendix VIII list. (This is not considered a significant impact)</p> <p>CAA 2: AMC M.A.803 (3) requires a pilot owner to demonstrate competence to carry out maintenance tasks before issuing a certificate of release to service. There is no guidance on who he has to demonstrate competence to and if this should be recorded or where it should be recorded. This guidance should be reviewed with a view to providing a clearer understanding of what pilot/owner competency is required. See recommendation</p> <p>BGA 1: There could be a significant impact for gliders if appendix VIII does not consider the operational activities of gliders separately from other aircraft. See recommendation.</p>
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS**Safety Recommendation**

VDS & BBAL: It is recommended that a complete re-evaluation of appendix VIII be carried out to separate safety items from the list (e.g. items 16 and 22) and to separately identify glider and balloon maintenance activities from other aircraft.

It is also recommended to remove operational activities (e.g. item 32) from appendix VIII.

Economic recommendation.

SCAA 2: We recommend that the basic 50 hour task for privately operated aeroplanes of simple design with a MTOM of <2730kg should be included in appendix VIII.

Other recommendation

CAA 2: Further AMC material should be developed to give a method of compliance (e.g. pilot/owner competence) with M.A.803 for the tasks listed in Appendix VIII.

iv) Sub Part: I AIRWORTHINESS REVIEW CERTIFICATES**Paragraph Reference: M.A.901 Aircraft Airworthiness Review****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	DGCA 1: The means provided to check that a heavy aircraft is really in a controlled environment do not seem clear. What should the 'I' organisation do if it detects that the aircraft has not respected the condition for being in a controlled environment? Should it refuse to sign the certificate or the recommendation?
ITALY	ENAC 1: ENAC advised that the continuing aircraft airworthiness over sight was traditionally a responsibility of ENAC. New privileges will be given to private organisations and cultural changes may need to enable the new system to work safely.
SWEDEN	Nil
POLAND	CAO1: It is felt as a safety issue the fact that the aircraft airworthiness review could be reported and records completed in a language other than the national language. CAO2: This regulation is still being analysed by the authority. They may have trouble getting small organisations to comply.
GERMANY	VDS: There are very good experiences in some European countries like Austria or Sweden with longer periods between renewal of ARC (but still with annual inspection) which show clearly that this causes no safety hazard but reduces bureaucratic and financial burden e.g. gliders.

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC 1: There could be a significant impact where the Subpart G organisation is based in another Member State and/or the ARC recommendation is made to a different State of aircraft registry. This may be difficult to accept without oversight knowledge of the Subpart G organisation. This is not addressed by this RIA and is a European standardisation issue.
ITALY	ENAC: There is a safety risk during the transition period until the rules and responsibilities are understood and implemented by industry and the authority. A safety recommendation is made to clarify the rule.
SWEDEN	Nil
POLAND	CAO1: The risk is minimal, as the authority can request further information which could be a translation of the airworthiness review or of the recommendation report into its own language. The risk would be reduced further if a standard template were adopted as recommended in M.A.710. CAO2: There is a risk during the transition period. However we are unable to make an assessment.
GERMANY	VDS: Agreed. Extending the time between the ARC is not seen as a safety risk as long as it is controlled. See recommendation

ECONOMIC IMPACT COMMENTS

UK	(RAC & BBGA & AOPA & PFA 1) – Most owners will not contract a Subpart G organisation, therefore will require an airworthiness review every year instead of every 3 years. This is likely to treble the current cost of renewing a Certificate of Airworthiness. The current LAMS 3 year star annual check (Airworthiness Review) should continue with the intervening two annual checks completed by an appropriate licensed engineer to validate a C of A. (RAC & BBGA & PFA 1) – The one-year validity period will add significant costs with no safety benefit.
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FRANCE	<p>FFVV & FFA: The need to have the certificate signed by the authority based on a recommendation every year is expensive. There will be an increase in administrative costs attributable to the temporary immobilisation of personnel and aircraft awaiting delivery of an ARC. For small organisations unable to obtain such M.A. 711(b) privilege, the review has to be carried out 3 times, tripling the costs.</p> <p>FFVV: What is the added value of the authority accepting the recommendation. (AOPA) There will be the costs of an examination and indirect costs of the immobilisation of the aircraft.</p>
ITALY	<p>AOPA 1& ENAC 1: Issuing ARCs by private organisations will be more expensive than the current fees of ENAC, especially for annual frequency compared with today 3 year process.</p> <p>AOPA 2: AOPA explained that under current practices, some private pilots perform CAM tasks themselves. ENAC renews the C of A and it is renewed by every three-year period.</p> <p>Under Part M, owners must either:</p> <ul style="list-style-type: none"> • Pay a CAMO to provide a controlled environment or • Undertake a yearly ARC review. <p>AOPA: Consider that this will be more expensive without any extra safety benefit. AOPA: Request an amendment to the Regulation approving private owners that demonstrate competence and capabilities to undertake CAM tasks restricted to their own aircraft. Furthermore, AOPA request that such maintenance be considered within a controlled environment so that airworthiness reviews may continue to be required, as today, once every three years.</p> <p>ENAC: Under M.A.901 (a), the system envisaged by Part M for aircraft not in a controlled environment may result in or be perceived as worsening in terms of costs (costs for issuance of the recommendation by the Subpart G organisation and for the issuance of the ARC by the Authority) and workload especially for aircraft privately used.</p> <p>AOPA 3: M.A.901 should not have any particular effect, provided that, in the case of an owner/operator/pilot this task and the associated responsibilities are implemented by the subject himself as stated by M.A. 201. An owner/operator/pilot should be anyway entitled to issue an ARC in conjunction with an approved maintenance organization as per subpart F, remaining subject only to monitoring activity by the relevant CAA.</p>
SWEDEN	SCAA 1: No effect on SCAA or aircraft owners, a yearly airworthiness review is already required. Exception for gliders where the airworthiness review is required only each 5 years.
POLAND	Nil
GERMANY	LBA1: The new requirements for aircraft in an uncontrolled environment are more cost intensive, because an additional fee for the issue of the ARC by the authority is expected.

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	RAC & BBGA & PFA 1: See other impact (CAA 1) and recommendation below.
FRANCE	<p>FFA & FFVV: This will have a significant effect on the cost of validating a C of A annually. See recommendation made.</p> <p>FFVV: This question is not the subject of this RIA.</p> <p>AOPA: Agreed. These additional costs will be reduced if the recommendation is accepted.</p>

ITALY	<p>AOPA 1 & ENAC: The size of the current subsidy is unknown therefore we are unable to assess the impact of this change. Any increase in the charges may be reduced due to competition between Subpart G organisations.</p> <p>AOPA 2: This proposal is not the current practise and contradicts many existing national regulations therefore we consider this would not achieve a consistent standard. The regulation has no impact.</p> <p>ENAC: Agreed. However the costs and workload will be reduced to current levels if the recommendation is accepted.</p> <p>AOPA2 + ENAC2: This will have a significant impact on pilots and generally speaking in small aviation, based on the fact that they have to renew C of A annually instead on a three year basis claiming that many of some owners only flight 50 or even less hours annually. See recommendation.</p> <p>AOPA 3: This is not considered acceptable due to standardisation requirements.</p>
SWEDEN	SCAA 1: In the case of the gliding sector where at present the airworthiness review is only required every 5 years, there will be additional costs to aircraft owners. This will be reduced if the recommendation is accepted.
POLAND	Nil
GERMANY	LBA1: This will be more expensive for industry if the LBA charge an extra fee for this activity. This is being assessed by the LBA and we are unable to assess this comment until the fees are determined. See recommendation for light aircraft.

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: With M.A.901, there is a risk that the F+G approved organisations would be in the position of being controlled by competing F+G+I approved organisations. The consequence would be a concentration of F+G+I integrated organisations. Small aircraft would be considered as non-profitable and not included in their scope. With M.A. 901 (c), what happens where there are not enough approved organisations for all models of aircraft?
ITALY	AOPA 1: Private aviation could diminish.
SWEDEN	SCAA 1: No effect if present regulation is changed with regard to one-man Subpart G organisations that also should have the privilege to <u>recommend</u> the issuance of the ARC. Otherwise it will have a great impact on owners and private operators of small aeroplanes in Sweden.
POLAND	Nil
GERMANY	LBA: The LBA will need more staff and more training.

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: There is a risk that the majority of work will be captured by the larger Subpart F+G+I organisations, which may not cover all models of aircraft. For aircraft not covered by these large organisations the owners will incur additional positioning expenses. This is similar to M.A.712 assessment.
ITALY	AOPA: The risk of private aviation diminishing is reduced if the recommendation is accepted.
SWEDEN	SCAA1: Accepted. This will not have an impact if the recommendations made in M.A.712 and M.A.901 are accepted.
POLAND	Nil
GERMANY	LBA: There will be an impact, which will be reduced if the recommendation in M.A.901 is accepted.

OTHER IMPACT COMMENTS

UK	<p>CAA 1: There is a disparity between the referenced requirements in which the former requires a recommendation from a Subpart G the latter does not hence authority has total responsibility.</p> <p>CAA 2: CAA has over 26 years of experience with a continuing airworthiness approval process based upon a 3 year cyclic airworthiness certificate renewal and questions the need in Part M for such a formal controlled environment for aircraft below 2730Kgs. In the interim years 1 & 2 the continuing airworthiness maintenance review responsibility was placed upon a licensed certifier with a record in the aircraft log book. This would represent an uncontrolled environment and has delivered a satisfactory safety record without the need for such formal contractually controlled measures as currently required by sub part I. Such control measures are considered onerous for GA operators in the light of this experience.</p>
FRANCE	DGAC: Where the authority does not carry out the airworthiness review itself, the ARC should be signed by the authority upon a recommendation from a G organisation. There is then no added value from the authority. This implies that the authority bears a responsibility.
ITALY	Nil
SWEDEN	SCAA 1: We object to the last sentence on the Airworthiness Review Certificate EASA form 15b (appendix III), which is signed when extending the ARC i.e. "The aircraft is considered to be airworthy at the time of issue" as no airworthiness review has been carried out and the only statement that can be made is that the aircraft has been in a controlled environment for the past 12 months.
POLAND	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: The commenter has misunderstood the requirement. There is no difference compared with current responsibilities. (Not considered a significant impact)
	CAA 2: The UK CAA has considered the overall safety record of its fleet of aircraft below 2730 Kg and the associated continuing airworthiness processes. In 1978 the UK CAA adopted a 3-year cyclic continuing airworthiness process.
	The C of A is subject to renewal at 3-year intervals based upon a recommendation from an appropriately approved organisation. This includes the completion of an airworthiness review similar to the review in M.A.710. The aircraft are also required to be maintained in accordance with an approved maintenance schedule.
	Verification of this process by the CAA has been by periodic audit of the approved organisation and by product survey of in service aircraft. Since this 3-year cyclic process was implemented the average age and size the UK fleet has increased. Details of the UK fleet statistics are included below at table 1. From the available data, the number of reportable incidents and accidents has remained low. A recent review in 2003/2004 of the reportable occurrence database did not identify any maintenance related safety action items for further study.
	It is estimated that there will be a significant increase in activity and a potential cost burden to the owner/operator to convert from a 3 year airworthiness review to a 1 year procedure as required by Part M for this particular fleet.
	Based on this past CAA experience the assessment is that a 3-year full airworthiness review (M.A.710) would achieve a satisfactory level of safety for this sector of general aviation operations. This would also recognise the differences in complexity of the type of aircraft and apply a proportionate approach in mitigating the risks. (See recommendation)

	Table1 UK Fleet Data				
			F/W <2730	R/W <2730	F/W >2730 <5700
	1	Total number of aircraft with a current C of A	4357	785	197
	2	Average age of fleet in years	29	14	22
	3	Average flight hours per aircraft per annum Transport C of A	220	231	344
	4	Average flight hours per aircraft per annum Private C of A	67	71	155
FRANCE	DGAC: This responsibility is an ICAO requirement and cannot be assessed as part of this RIA.				
ITALY	Nil				
SWEDEN	SCAA 1: There is no impact. The Subpart G signatory is confirming that the aircraft has remained within a controlled environment and therefore all the necessary maintenance has been performed.				
POLAND	Nil				
GERMANY	VDS: When the regulation is applied and the EGU/EAS and manufacturers are subpart F and G approved there is no limitation to get also the M.A.711(b) privilege.				

RECOMMENDATIONS

Safety, Economic and Other recommendation

ENAC, CAA 2 & PFA & BBGA & RAC: – **Rule change as follows:-**

M.A.901 (e) Whenever circumstances show the existence of a potential safety threat **or in the absence of a continuing airworthiness management organisation approved for the aircraft type**, the competent authority may decide to carry out the airworthiness review and issue the airworthiness review certificate itself. In this case the owner or operator shall provide the competent authority with:

- The documentation required by the competent authority,
- Suitable accommodation at the appropriate location for its personnel, and
- When necessary the support of personnel appropriately qualified in accordance with Part-66

CAA 2 & PFA & BBGA & RAC: – **Rule change as follows:-** Add new M.A.901 paragraph

M.A.901 (f) – by derogation to M.A.901 (d), for non-commercial air transport aircraft of 2730kgs or less maximum take-off mass and excluding helicopters the validity of the Airworthiness Review Certificate (ARC) may be:

1. extended twice by an M.A.801 (b) 2 certifying person appropriately licensed for the aircraft type, when satisfied that all maintenance required during the previous 12 months has been carried out satisfactorily, and
2. extend the ARC for one year each time, and
3. not extend the ARC if the certifying person is aware or has reason to believe the aircraft is unairworthy.

The competent authority following an application, satisfactory assessment and recommendation made by an appropriately approved continuing airworthiness management organisation shall reissue the ARC. The recommendation shall be based on an airworthiness review carried out in accordance with M.A.710.

Sub Part: **I AIRWORTHINESS REVIEW CERTIFICATES**

Paragraph Reference: **M.A.902 Validity of ARC**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil

SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil

SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: I AIRWORTHINESS REVIEW CERTIFICATES**Paragraph Reference: M.A.903 Transfer of Aircraft Within EU****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: It is today impossible to determine what will be the impact on the movement of aircraft of regulation 904a. FFVV: impact is positive, leading to a reduction in costs.
ITALY	ENAC 1: Probably this will have a cost savings impact compared to current methods for transferring aircraft. AOPA: Provided the technical/ bureaucratic national organisations are working efficiently we do not expect particular problems.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC & FFVV: Accepted.
ITALY	ENAC 1 & AOPA: Accepted
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	RAC & BGA & AOPA & BBGA 1: If there is acceptance of certificates by all competent authorities this will make transferring aircraft easier. PFA 1: The transfer of aircraft within the EU will depend on the degree of standardisation across the Member States.
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: The ARC would reduce the need for inspections from the Authority side.

	However, there will still be a need for review of the maintenance program since the one approved by the transferring Authority may not be applicable after the transfer.
--	--

POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	RAC & BGA & AOPA & BBGA 1: This is assessed as a positive impact removing the need for an export C of A when transferring within the EU. (No action required) PFA 1: Standardisation is not part of this impact assessment. (No action required)
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: This is assessed as a positive impact removing the need for an export C of A when transferring within the EU. (No action required)
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: As the conditions for the issue of a C of A are harmonised within the EU in accordance with EC No 1702/2003, the requirement to issue an ARC will have no influence on the transfer of aircraft within the EU. However the regulation is not clear on how the bridging programme for maintenance is defined, what the language of labels in the cockpit will be etc
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: The requirements of a maintenance bridging check are not defined in Part M. This is considered to be a Part 21 issue and has not been assessed as part of this RIA.
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: I AIRWORTHINESS REVIEW CERTIFICATESParagraph Reference: **M.A.904 Aircraft Imported Into EU****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: Part M permits the competent authority to issue the ARC for aircraft imported into the EU, based on a CAMO recommendation. ENAC would prefer the regulation to be modified to allow the authority, especially for new types under that Member State registration to issue the airworthiness review.
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA: For the time being there are several bilateral agreements with Non-EU-member states to accept their C of A. The airworthiness review is limited to a few items in this case, which do not cover all items mentioned in AMC M.A.904 (a) & (b). New procedures

	will have to be settled.
--	--------------------------

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: This possibility is provided for in M.B.902 (a). No impact.
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA: Accepted. This is not part of this RIA.

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: It is today impossible to determine what will be the impact on the movement of aircraft of regulation M.A.904 (a). FFVV: The impact is positive. Facilitating the transfer of aircraft will reduce costs
ITALY	ENAC: No difference is envisaged in the case of transfer of aircraft into the European Union from a non- EU Country.
SWEDEN	Nil
POLAND	CAO: Around 50 A/C are imported into Poland yearly. There is fear that this number will decrease if small A/C cannot be imported from American or Russian manufacturers easily.
GERMANY	VDS: the rules for importing CS-22 aircrafts into the EU will improve those transfers.

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC & FFVV: Accepted
ITALY	ENAC: Accepted
SWEDEN	Nil
POLAND	CAO: This is believed to be a Part 21 issue on the acceptance of a type design by EASA.
GERMANY	VDS: Accepted

SOCIAL IMPACT COMMENTS

UK	CAA 1: Imported aircraft must go to a Subpart G organisation, at present a licensed engineer may present A/C for the issue of a C of A.
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: In principle an airworthiness review by an organisation or a maintenance engineer is required by the SCAA regulations before any import inspection although this is not a formal requirement. M.A.904 (a)(2) requirement for the airworthiness review is supported under the condition that also a one-man organisation approved under Subpart F should be able to recommend the ARC in case of small aeroplanes.
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: Any recommendation for the issue of an ARC's may come from an individual as long as he is appropriately approved. (This not considered a significant impact)
FRANCE	Nil
ITALY	Nil
SWEDEN	SCAA 1: There will be an impact on current one-man organisations unless the recommendation made in M.A.712 is accepted. This would allow an individual to be a Subpart G organisation with the privilege to recommend ARC's.
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	CAA 2: A Subpart G organisation has a role in confirming the airworthiness of an aircraft imported into the EU. Details of procedures required to support this activity should be included at MA701.
FRANCE	Nil
ITALY	ENAC 2: ENAC are concerned that if there are no CAMOs with a specific scope of approval for that particular type of aircraft, difficulties could arise for importing new types of aircraft in the country.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 2: The CAME Part 4 Para 4.4 should include such procedures. This is not considered a significant impact
FRANCE	Nil
ITALY	ENAC2: This activity could then be carried out by the authority or a recommendation provided by any CAMO located in another Member State.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: I AIRWORTHINESS REVIEW CERTIFICATES
Paragraph Reference: M.A.905 FINDINGS

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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SECTION B – PROCEDURE FOR COMPETENT AUTHORITIES**Sub Part: F MAINTENANCE ORGANISATION****Paragraph Reference: M.B.601****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	CAA 1: M.B 104 (b) 8 & 9 and (c). Retention of these records imposes onerous record keeping practices for the storage of superseded amendments to expositions and maintenance programmes. This should be the responsibility of the owner/operator or approval holder.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: This is not a significant impact. Transfer of responsibility for record keeping to owner/ operator or approval holder would not reduce the overall economic impact, but merely shift costs from one group to another.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil

GERMANY	Nil
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OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: F MAINTENANCE ORGANISATIONParagraph Reference: **M.B.603****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: It is believed that competent authorities should make public to member states a list of all Subpart F approved maintenance organisations, in order to recognise maintenance work performed in an EU organisation outside the country, and so the CRS issued considered valid.
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: Agreed. No impact
GERMANY	Nil

Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATIONParagraph Reference: **M.B.701****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	DGAC: There will be a resource impact on DGAC/GSAC to administer this approval.
ITALY	ENAC 1: Fees for new competences of the authority have still to be decided. Potential cost increase transferred to aircraft owners.
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA: There will be a resource impact.

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	DGAC: There is an impact, which is being considered by the DGAC.
ITALY	ENAC 1: There is an impact, which is being considered by ENAC
SWEDEN	Nil
POLAND	Nil
GERMANY	LBA: There is an impact, which is being considered by the LBA. See assessment M.A.710

SOCIAL IMPACT COMMENTS

UK	CAA 1: Resource impact on CAA to administer this approval for aircraft below 2730Kgs. Poor take up of approval in the non-commercial air transport area could place a demand on competent authority resource to fill the gap. Owners unable to complete required reviews.
FRANCE	Nil
ITALY	ENAC 2: ENAC are already working towards the introduction of Part M and anticipate that their workload will increase significantly during the transition phase. After the transition period, ENAC anticipate that the extra workload of continuing oversight of new organisations will be similar to the reduction in workload through the delegation of the issuance of (most) ARCs.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: This is accepted however we are unable to assess the effect until Part M is fully implemented.
FRANCE	Nil
ITALY	ENAC 2: Accepted
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION
Paragraph Reference: M.B.704

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: ENAC will create a new system to perform surveys on aircraft when continuing oversight is managed by new CAMOs. Requirements are yet to be defined. (typically-being in the sample selection and the size of the sample, as described in MB.704c). ENAC are also studying the ability for CAMOs to directly feed the ENAC database of C of A renewal for aircraft under Italian registration.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: Accepted
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: **G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION**
Paragraph Reference: **M.B.707**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil

POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	CAA 1: The basic model for the department that undertakes the airworthiness review function is an appropriately qualified manager in accordance with the requirements with partially compliant trained staff. The requirement as now written does not change this model but it can be seen there is room for interpretation that will require all review staff to be appropriately qualified in accordance with the requirement this would have Economic implications.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: Accepted
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

Country	Comments
UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Sub Part: I AIRWORTHINESS REVIEW CERTIFICATES**Paragraph Reference: M.B.901****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Polish Authority: Recommendation received from the CAMO that carried out the airworthiness review should be better defined, so ARC issuance from the competent authority is made with minimum guarantees.
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	CAO: This is accepted. This will be reduced if the recommendation to produce a template for the ARC recommendation is accepted. (Reference M.A.710)
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	CAA 1: There will be a number of owners and operators who will not enter into a formal arrangement to manage maintenance then this will result in an increase of CAA administrative and technical involvement in renewing ARCs on an annual basis rather than the current triennial process.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: This will increase costs to the CAA but will be offset by the reduced activity of delegating the ARC renewal to industry.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	CAA 2: The stated qualifications for an ARC to be carried out by a competent Authority are too specific. Some members of staff at CAA currently do not meet these criteria but have backgrounds with equivalent experience/qualifications. The requirement needs to be more flexible.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 2: This will be down to the interpretation of the requirements; it is believed that the Final consolidated report
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	current C of A renewal signatures will be acceptable as ARC signatures. No significant impact.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: ENAC considers there is no added value when the Authority signs an ARC upon receipt of an application based on a CAMO's recommendation in accordance of M.A. 901(d). Also responsibilities derived from the authority signing the ARC are uncertain. It is thought that Regulation requires clarification on this subject.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	ENAC 1: It is believed the requirement for the authority to sign for the issue of the ARC after a recommendation is based on the authorities ICAO annex VIII responsibilities. In general the rule would benefit from further clarification but this is comment does not represent a significant impact requiring a rule change.
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: **G CONTINUING AIRWORTHINESS MANAGEMENT ORGANISATION**
Paragraph Reference: **M.B.902**

SAFETY IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	CAA 1: Authority may be at an Economic risk from carrying out airworthiness review.
FRANCE	Nil

ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: The additional economic risk could not be identified as any different from the current C of A renewal process that is carried out today. No additional significant impact.
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

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Sub Part: APPENDIX 1**Paragraph Reference: Continuing Airworthiness Arrangement****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS

UK	CAA 1: To achieve consistency of wording with that in Appendix I para 1 should refer to "competent authority of the Member State of Registry".
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FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROSAFE IMPACT ASSESSMENT

UK	CAA 1: The proposed word change would provide a more consistent document. (See recommendation for rule change wording)
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Safety recommendation

SNIPAG: - Rule change required –

It is recommended to add the following:

Paragraph 5.2 Item 10 - Inform the approved organisation of the aircraft flying hours on a regular basis”

Other impact recommendation

Editorial change proposed to the following paragraphs of Appendix 1

Para 5.1 5

Para 5.1.6

Para 5.1.7

Para 5.1. 9

Para 5.2.7

Para 5.2.8

Ensure wording reads “...competent authority of the Member State of Registry...”

Sub Part: APPENDIX VIII**Paragraph Reference: Limited Pilot Owner Maintenance****SAFETY IMPACT COMMENTS**

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SAFETY IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

ECONOMIC IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil
GERMANY	Nil

SOCIAL IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	Nil
FRANCE	Nil
ITALY	Nil
SWEDEN	Nil
POLAND	Nil

GERMANY	Nil
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OTHER IMPACT COMMENTS

UK	CAA 1: To ensure the limited pilot maintenance is included for Gliders, Balloons and Airships. As Appendix VIII is a generic list covering all types of Aeroplanes, Helicopters Gliders, Balloons and Airships, to ensure that the task is appropriate for every individual variant of aircraft. Within the first paragraph of the Appendix VIII a reference is made to the appropriate tasks being contained in the maintenance programme.
FRANCE	Nil
ITALY	AOPA 1: Current Italian regulation allows pilots to perform minor maintenance tasks on their aircraft. Industry representatives felt that the description of the tasks in annex VIII is too much precise. They are concerned that slightly different yet less demanding tasks may fall outside the description. Their suggestion is that the list should be defined and detailed in the maintenance programme of each aircraft.
SWEDEN	SCAA 1: Appendix VIII should identify pilot /owner maintenance tasks specific to balloons and gliders and amphibian aircraft patching small holes in floats or hulls.
POLAND	Nil
GERMANY	Nil

OTHER IMPACT COMMENTS - AIR EUROS SAFE IMPACT ASSESSMENT

UK	CAA 1: This appendix will have a significant impact for pilot owners and a complete review of the applicability of each task to gliders, balloons, airships and light aircraft should be carried out. It is also recognised that glider and balloon operational items have been included in the appendix as maintenance items, which puts an unnecessary constraint on the assembly and disassembly of these aircraft. See recommendation below and safety recommendations made in M.A.803.
FRANCE	Nil
ITALY	AOPA 1: See (CAA 1) assessment and recommendation.
SWEDEN	SCAA 1: See (CAA 1) assessment and recommendation.
POLAND	Nil
GERMANY	Nil

RECOMMENDATIONS

Other impact recommendation – Note this recommendation should be considered together with the safety recommendation made in M.A.803. CAA 1 & SCAA 1: Change Appendix VIII as follows:-	
Limited Pilot Owner Maintenance The following constitutes the limited pilot maintenance referred to in M.A.803 provided it does not involve complex maintenance tasks, and is carried out in accordance with M.A.402. <i>Limited pilot owner maintenance tasks as appropriate to a particular aircraft must be specifically listed in the maintenance programme:</i>	
1.	Removal, installation of wheels, <i>and in the case of gliders replacement of elastic landing gear door operating straps.</i>
2.	Replacing elastic shock absorber cords on landing gear.
3.	Servicing landing gear shock struts by adding oil, air, or both.
4.	Servicing landing gear wheel bearings, such as cleaning and greasing. <i>In the case of gliders replacement and servicing of main and tailskids.</i>
5.	Replacing defective safety wiring or cotter keys.
6.	Lubrication not requiring disassembly other than removal of non-structural items such as cover plates, cowlings, and fairings.
7.	Making simple fabric patches not requiring rib stitching or the removal of structural parts or control surfaces. In the case of balloons, the making of small fabric repairs, <i>excluding complete panels</i> , to

	envelopes (as defined in, and in accordance with, the balloon manufacturers' instructions <i>type certificate holders' instructions</i>) not requiring load tape repair or replacement.
8.	Replenishing hydraulic fluid in the hydraulic reservoir.
9.	Refinishing decorative coating of fuselage, balloon baskets, wings tail group surfaces (excluding balanced control surfaces), fairings, cowlings, landing gear, cabin, or cockpit interior when removal or disassembly of any primary structure or operating system is not required.
10.	Applying preservative or protective material to components where no disassembly of any primary structure or operating system is involved and where such coating is not prohibited or is not contrary to good practices.
11.	Repairing upholstery and decorative furnishings of the cabin, cockpit or balloon basket interior, or balloon basket when the repairing does not require disassembly of any primary structure or operating system or interfere with an operating system or affect the primary structure of the aircraft.
12.	Making small simple repairs to fairings, non-structural cover plates, cowlings, and small patches and reinforcements not changing the contour so as to interfere with proper airflow. <i>In the case of gliders minor repairs to direct vision windows and canopies.</i>
13.	Replacing side windows where that work does not interfere with the structure or any operating system such as controls, electrical equipment, etc
14.	Replacing safety belts, <i>and harnesses In the case of balloons, airships and gliders.</i>
15.	Replacing seats or seat parts with replacement parts approved for the aircraft, not involving disassembly of any primary structure or operating system.
16.	Trouble shooting and repairing broken circuits in landing light wiring circuits. <i>In the case of gliders trouble shooting and repairing broken wiring circuits for non-critical optional equipment.</i>
17.	Replacing bulbs, reflectors, and lenses of position and landing lights.
18.	Replacing wheels and skis where no weight and balance computation is involved.
19.	Replacing any cowling not requiring removal of the propeller or disconnection of flight controls.
20.	Replacing or cleaning spark plugs and setting of spark plug gap clearance.
21.	Replacing any hose connection except hydraulic connections. <i>In the case of balloons and airships, the replacement of propane or similar hoses is prohibited.</i>
22.	Replacing prefabricated fuel lines. <i>In the case of balloons and airships the replacement of prefabricated fuel lines is limited to flexible hose types with quick release connectors.</i>
23.	Cleaning or replacing fuel and oil strainers or filter elements.
24.	Replacing and servicing batteries.
25.	Cleaning <i>and replacement</i> of balloon burner pilot, main nozzles <i>and piezo-electric igniters</i> in accordance with the balloon manufacturer's <i>type certificate holder's</i> instructions.
26.	Replacement or adjustment of non-structural standard fasteners incidental to operations.
27.	The interchange of balloon baskets, <i>fuel cylinders</i> and burners on envelopes when the basket, <i>fuel cylinder</i> or burner is designated as interchangeable in the balloon type certificate data and the baskets, <i>fuel cylinders</i> and burners are specifically designed for quick removal and installation.
28.	The installations of anti-mist fuelling devices to reduce the diameter of fuel tank filler openings provided the specific device has been made a part of the aircraft type certificate data by the aircraft manufacturer, the aircraft manufacturer has provided instructions for installation of the specific device, and installation does not involve the disassembly of the existing tank filler opening.
29.	Removing, checking, and replacing magnetic chip detectors.
30.	Removing and replacing self-contained, front instrument panel-mounted navigation and communication devices that employ tray-mounted connectors that connect the unit when the unit is installed into the instrument panel, (excluding automatic flight control systems, transponders, and microwave frequency distance measuring equipment (DME)). The approved unit must be designed to be readily and repeatedly removed and replaced, not require specialist test equipment and pertinent instructions must be provided. Prior to the unit's intended use, an operational check must be performed. <i>In the case of gliders or powered glider's instrument panels, these may be removed and reinstalled providing all air data connections are self-sealing connector blocks.</i>
31.	Updating self-contained, front instrument panel-mounted Air Traffic Control (ATC) navigational software databases (excluding those of automatic flight control systems, transponders, and microwave frequency distance measuring equipment (DME)) provided no disassembly of the unit is required and pertinent instructions are provided. Prior to the unit's intended use, an operational check must be performed.

32.	Replacement of wings and tail surfaces and controls, <i>balloon envelopes, baskets, burners and controls (including safety pins, turnbuckles and karabiners)</i> the attachment of which is designed for assembly immediately before each flight and dismantling after each flight. <i>In the case of gliders minor adjustment to non-flight or propulsion controls whose operation is not critical for any phase of flight.</i>
33.	Replacement of main rotor blades that are designed for removal where specialist tools are not required.
34.	<i>Replacement of balloon and airship fuel cylinder quick release connector seals where accessible in accordance with the balloon type certificate holder's instructions.</i>
35.	<i>Minor adjustment of balloon burner shut-off valves without disassembly in accordance with the balloon type certificate holder's instructions.</i>
36.	<i>Replacement of balloon envelope temperature sensors.</i>
37.	<i>Minor adjustment of balloon basket skids retaining fasteners in accordance with type certificate holders' instructions.</i>
38.	<i>In the case of a self-sustaining gliders the removal only of the propulsion system where defined in the Flight Manual as a pilot task and where all connections are self sealing</i>
39.	<i>Cleaning and lubrication of glider tow release units where specified as a daily inspection.</i>
40.	<i>In the case of gliders, replacement of flying control self adhesive sealing tapes and turbulators providing removal of a control surface or operating system is not required, and a full and free check of the controls is carried out.</i>
41.	Minor scheduled maintenance (excluding Airworthiness Directives unless specifically allowed) required at 50 hours/ 6 months or less for piston-engine aeroplanes, piston-engine helicopters, gliders, balloons or airships with MTWA not exceeding 2730 Kg where specified in accordance with M.A.803(c).