



Novosti na področju zakonodaje

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Posvet na temo začetne in stalne plovnosti
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Vsebina

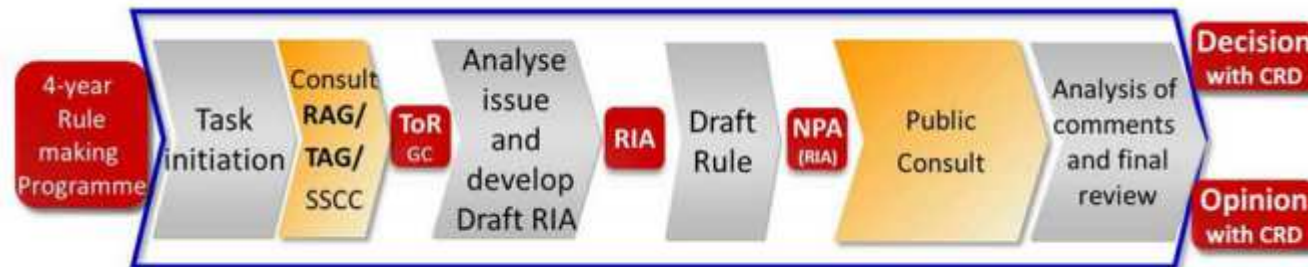
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- Viri
- Način sprejemanja sprememb
- Zadnje spremembe
- Prihajajoče spremembe
- Nova struktura regulative

Vir prihajajočih sprememb oziroma predlogov

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- ToR - Terms of Reference
- RIA - Regulatory Impact Assessment
- NPA - Notices of Proposed Amendment
- CDR – common response document

Rules recently adopted

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→ Regulation (EU) 1536/2015

- Introduces requirements for error capturing methods in the case of critical tasks.
- Introduces a new Part-T with continuing airworthiness requirements for aircraft registered outside the EU when they are operated under the AOC (dry-lease) of an EU licensed air carrier.
- Introduces additional requirements for the NAAs for their ACAM programme (Aircraft Continuing Airworthiness Monitoring), in particular, the need to use a risk-based approach.
- Replaces the term “large aircraft” by “complex motor-powered aircraft” (see next slide)

Applicable since 25 August 2016.

Rules recently adopted

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→ Impact on some aircraft

- **Twin-turboprop aeroplanes** below 5700 kg MTOM (and a small number of other aeroplanes) were not “large aircraft” but **they are “complex motor-powered aircraft”**.

(MORE STRINGENT REQUIREMENTS APPLY)



- **Twin-engine helicopters** below 3175 Kg MTOM were “large aircraft” but **they are not “complex motor-powered aircraft”**.

(LESS STRINGENT REQUIREMENTS APPLY)



Rules recently adopted

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- Consequences for the Twin-turboprop aeroplanes below 5700 Kg MTOM:
 - Obligation to:
 - Contract a CAMO
 - Perform maintenance in a Part-145 organisation.
 - Release base maintenance with Part-66 cat. C certifying staff.

- Measures to mitigate the impact:
 - Member States were notified by EASA that they can grant Article 14 exemptions allowing twin turboprop aeroplanes below 5700 Kg MTOM to apply the rules of non-complex motor-powered aircraft.
 - These exemptions should not go beyond 01 January 2020.
 - In parallel, the Commission will adopt a new regulation exempting those aircraft from the requirement to contract a CAMO and a Part145 maintenance organisation until 01 January 2020 (since it is expected that the new Basic Regulation currently being discussed will change the concept of complex motor-powered aircraft).

Pending adoption by the Commission (already voted)

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- In the EASA Committee of 17/18 February 2016, the Member States unanimously agreed on the following:
 - New B2L and L Part-66 licences (ref. Opinion 05/2015)
 - Procedures Part-145 organisations in order to control suppliers of spare parts (ref. Opinion 12/2013).
 - Limitation of the Part-147 privileges related to stand-alone basic examinations (ref. Opinion 07/2015).
 - Exemption for twin turbo-prop aeroplanes <5700 Kg MTOM.
- The applicability calendar will be the following:
 - B2L licence: 6 months after adoption.
 - L-licence: 01 October 2018 (obligation for NAAs to start issuing them) and 01 October 2019 (obligation for all certifying staff to have it).
 - Procedures for control suppliers of spare parts: 6 months after adoption.
 - Limitation of the Part-147 privileges related to stand-alone basic examinations: Immediate effect after adoption.
 - Exemption for twin turbo-prop aeroplanes <5700 Kg MTOM: Immediate effect after adoption

New structure of the Regulation

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The new structure proposed for the continuing airworthiness regulation is the consequence of:

- Part-M General Aviation Task Force (Phase II):
Opinion 05/2016 issued on 13 April 2016:
 - New Part-ML
 - New Part-CAO (without SMS)

- SMS for CAMOs (RMT.0251 Phase I): **Opinion 06/2016** issued on 12 May 2016.
 - New Part-CAMO (with SMS) and management system for NAAs in relation to CAMOs.

New structure of the Regulation



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→ Part-ML

→ Part-CAO (with no SMS)

→ Part-CAMO (with SMS)

Note: Expected to be voted in the first half of 2017.

Part-ML

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Applicable to:

- aeroplanes up to 2730 Kg
 - other ELA2 aircraft and
 - helicopters up to 4 occupants and 1200 Kg.

- Applicable to private and commercial operations but not to Commercial Air Transport (in the sense of licensed air carriers per (EC)1008/2008).

NOTE: This means that Part-ML covers all sailplanes and balloons, even if they carry passengers (balloons and sailplanes are excluded from 1008/2008)

Part-CAO

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Proposes a new “**Combined Airworthiness Organisation**” (Part-CAO) for General Aviation:

- Applicable to **non-complex non-CAT aircraft** (some aircraft will follow Part-M and others Part-ML)
- **Combines the privileges** of a Subpart-F maintenance organisation and a CAMO.
- **No SMS**: They will continue with the current Quality System (or organisational reviews if the organisation is small).
- Introduces **simplified requirements, with more privileges** for the organisation to manage changes to scope of work, facilities, tooling, personnel, etc.

Current rule structure

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CURRENT RULE STRUCTURE		Non-CAT		CAT	
		Non-CMPA	CMPA	Non-CMPA	CMPA
Part-M		Applicable			
	Subpart F	Applicable	N/A	N/A	N/A
	Subpart G (CAMO)	Applicable			
Part-145		Applicable			
Part-66		Applicable			
Part-147		Applicable			
Part-T (Third country aircraft dry-leased by EU AOC holders)		N/A	N/A	Applicable	Applicable

Proposed rule structure

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PROPOSED RULE STRUCTURE		Non-CAT		CAT	
		Non-CMPA	CMPA	Non-CMPA	CMPA
Part-M		Applicable only to non-Light aircraft (Light aircraft must follow Part-ML)	Applicable		
	Subpart F	May still be used for 2 years after new Regulation. It disappears later.	N/A	N/A	N/A
	Subpart G (CAMO)	Disappears (transferred to Part-CAMO)			
Part-145		Applicable			
Part-66		Applicable			
Part-147		Applicable			
Part-T (Third country aircraft dry-leased by EU AOC holders)		N/A	N/A	Applicable	Applicable
Part-ML		Applicable to Light aircraft	N/A	N/A	N/A
Part-CAMO (with SMS)		Applicable			
Part-CAO (without SMS)		Applicable	N/A	N/A	N/A

SMS



RMT.0251 (SMS Phase II):

- Will cover the **introduction of SMS requirements for Part145** organisations, POAs (and maybe DOAs)
- Will assess the need for requirements for Part-147 organisations.
- Will introduce the associated authority requirements.
- Will include the involvement of a Review Group with experts from Industry and NAAs.
- New NPA planned 2018/Q1.
- Opinion planned 2019/Q2.

NOTE: It has been decided to disconnect the Opinion for RMT.0209 (M.014) "Contracting of CAMOs by commercial air transport operators" from task RMT.0251 (Phase II).

- Opinion planned 2017/Q3.

Other on-going tasks

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Expected in 2016, 2017 and 2018

- Task RMT.0276 "**Technical records**" Opinion will be published in November 2016
- Task RMT.0281 "**New training methods and teaching technologies**" Opinion planned 2017/Q1
- Task RMT.0393 "**Maintenance check flights**" Opinion planned 2017/Q1
- Task RMT.0217 "**CAMO and Part-145 responsibilities**" Opinion planned 2017/Q3
- Task RMT.0278 "**Importing of aircraft from other regulatory systems**" and RMT.0521 "**Airworthiness Review Process**" Will be delivered in a single Opinion. Opinion planned 2018/Q2
- Task RMT.0097 "**B1 and B2 Support Staff**" Opinion planned 2018/Q

Other on-going tasks

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- Task RMT.0588 “**ACAM – Review of KRE**”
 - Survey or workshop among NAAs in order to define the KRE to be reviewed.
 - Accelerated procedure.
 - NPA planned 2017/Q4.

- Task RMT.0537 “**Privilege for CAMOs to approve Flight Conditions**”
 - Task deleted from the Rulemaking Programme.
 - Due to other priorities.
 - Due to the fact that most of the flight conditions are linked to safety of design, and they were not part of the envisaged privileges to be given to CAMOs.

