



# **EASA UPDATE on LSA**

Jan Fridrich , LAA ČR Vicepresident  
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# SUMMARY

IT IS VERY DIFFICULT TO  
FIND OUT WHAT IS VALID  
RIGHT NOW FROM EASA  
REGULATIONS.

# INITIAL AIRWORTHINESS

## CS-LSA

CS-LSA was published and manufacturers can use it. The problem are requirements of Part 21 for DOA and POA.

There will be RTC- Restricted Type Certificate which will be based on CS-LSA

Restricted is used only as a means to avoid the requirements for Type certificate of engine and propeller.

## **Part M**

There will be EASA Workshop on Part M in GA on 27.October in Cologne.

We send our comments through Nils

## **Part 66 – licences for Mechanics**

During the approval process on the level of Council and Commission the light „L“ licence was lost, therefore the lowest available licence for mechanic is „B3“ licence which require 1000hours of theory .

New Working group on Rulemaking task GC 66.027 Issue 3 (on Subject 2) — Licensing system for ELA1 aeroplanes and aircraft other than aeroplanes and helicopters is supposed to start work, I am member for Czech Republic, so far no activity.

## **PART-OPS**

CRD was published and we commented it.

There was EASA online workshop in order to get more knowledge about the CRD.

The new system for answers to this CRD is required, CRT is used only as tool to deliver Excel spreadsheet..

EASA ignored recommendations of MDM032 to use only Essential Requirements, their argument is that we must fulfill ICAO Annex6 requirements.

## **PART- FCL**

I have no idea what is valid. FCL was not yet published. We know that LAPL is there (including 50km limited flight around the airfield) but without the LAFI (Light aircraft flight instructor)

## **EASA – mid term view**

### Reevaluation of Rulemaking plan

At the moment the plan contains too many tasks which EASA is not able to handle.

Reprioritisation, decreasing of number of tasks, external cooperation...

Details were introduced to the Management Board in recent days

### **There is need for change of Rulemaking procedure**

Not-flexible, long, not effective

In the future it is expected that there will be majority of small changes and adjustments.



# RULEMAKING PROCESS

EASA realized that it is too long

ToR	RIA-NPA	Consultation	CRD	Reactions	Opinion/Decision
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**CURRENT PROCEDURE - Total: from 20 to 50 months - Average: 35 months**

2-3 months	6-24 months	3 months	4-13 months	2 months	3-6 months
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**SIMPLE - Total: from 6 to 12 months**

0,5-1 m	2-6 months	1-2 months	1-2 months	0	1 month
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**STANDARD - Total: from 17 to 22 months**

2-3 months	9-11 months	3 months	2-3 months	0	1-2 months
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**COMPLEX / CONTROVERSIAL - Total: from 28 to 33 months**

2-3 months	18 months	3 months	3-5 months	0	2-4 months
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## **Identified problems**

- EASA proposed CS-LSA and ELA process is only partial solution
- European LSA is not US LSA, it is more like light VLA.

**The change of Basic Regulation 216/2008  
is needed in any case !**

# **What can European Commission do for us?**

- **Realize that Sports and Recreational Aviation needs different treatment and set of rules compared with CAT**
- **Create specific rules for the Sports and Recreational Aviation**
- **Cooperate with FAA to create Global LSA system**

# **What can European Commission and EASA do for us?**

- **Realize that Sports and Recreational Aviation needs different treatment and set of rules compared with CAT**
- **Create specific rules for the Sports and Recreational Aviation**
- **Cooperate with FAA to create Global LSA system**

## **What can EASA do for us**

- **Support our requests for change of EASA fees&charges**
- **Create Light Sport Directorate within EASA in order to address the needs of Sports and Recreational Aviation**
- **Invite representatives of Microlight & LSA industry to working groups dealing with Annex II or LSA**
- **Start BR010 as soon as possible!**

# **WHAT SHALL WE DO?**

**Change our behaviour!**

**Move from resistance approach  
to positive offensive approach**

# WHAT SHALL WE DO?

## LOBBY!!

- on all levels starting with national politicians
- We need to reply to all relevant EASA NPA
  - We need to explain to European Commission what we want – GLOBAL LSA
  - This message must come from all organisations representing Sports and Recreation Aviation as well as from the manufacturers

# Possible solution- European Commission and EASA

- **Commisson must answer following questions:**
  - Do You want to have Sports&Recreational Aviation in Europe?
  - So You agree that the S&R Aviation needs different rules than CAT?
- If the answer is **YES**:
  - **Require EASA to create separate rules for the needs of S&R Aviation ASAP**  
**Create within EASA separate Directorate for sport and recreational aviation**
- If the answer is **NO**:
  - **IT IS NECESSARY TO CHANGE EC**



QUESTIONS?

THANK YOU!