

Stakeholder Advisory Body

SAB Champion subcommittee report

SAB Plenary Meeting: SAB 18, 14th March 2023

SAB TEC/COM name: GA.COM Meeting and Combined GA.COM+GA.TeB

Date of last subcommittee meeting: 5 + 6 December 2022

Provided by: Michael Erb (IAOPA), GA.COM Chairman and GA Sector Representative

The tradition was continued to have one combined meeting of GA.COM and TeB, so the direct dialogue between industry and authorities remains assured.

Issues identified for the attention of the SAB Plenary:

(1) Air Ops Requirements for GA

The topic was divided into 3 subtopics.

The first subtopic, namely Proportionality of Air-OPS requirements was presented by the GA.COM vice-chairman. The presentation highlighted the problems that come at the boundaries between the Annexes and the issues raised for the interpretation of the 'operator' definition.

The presentation concluded that the criteria used to divide the ops classes do not adequately reflect the relevant assumptions.

The GA.COM Chairman, also highlighted that the 4th criteria of the EASA's definition of a "complex motor-powered aircraft" doesn't really make sense in the light of the new technology and suggested that it is needed to identify true criteria for aircraft complexity and support innovation in the sector of propulsion.

In the second subtopic the Austrian CAA representative specified the responsibilities of the competent authority in the different subparts of the Ops Regulation. He also expressed issues with actual definition of "competent authority" under NCO.GEN.100, which is related to the state of registration, not the place where the operator is established or residing which is the case in all other Annexes.

EASA informed the GA TeB and COM participants about the EVT.0013 task (Evaluation of the rules for commercial small aeroplane operations under Part CAT and Part SPO) and provided an update as per the third subtopic of the agenda item. EASA indicated that an evaluation task on analysing the proportionality of the rules for commercial small aeroplane operations under Part CAT and Part SPO is proposed.

[Action 1: GA.TeB and GA.COM to provide suggestions for the task scope and definition by Q1 2023 to EASA for consideration \(see also related Action 15\).](#)

(2) Unleaded AVGAS developments

Globally, the GA industry is jointly working to replace AVGAS additives containing lead (TEL). The GAMA representative presented the European and US Initiatives to ban TEL, described the impact for Leaded Avgas. In the USA a first unleaded Avgas 100 UL from

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GAMI has been certified via an STC. At this time, such a replacement fuel has not yet been approved in Europe.

The EASA expert confirmed that the European and US initiatives are in progress to remove toxic fuel additives from the Aircraft fuel market and foster the use of Unleaded fuels.

[Action 2: The item to be put on the agenda of next meeting. The meeting participants to share their ideas with EASA GA Roadmap Team.](#)

(3) GNSS reversion for GA- Potential synergies with FAA NAV strategy

The EAS representative reiterated the GNSS reversion for GA topic outlining alternatives in case of a GPS failure. However, for GA there are currently technical challenges for all these alternatives. The presentation moved to the FAA Navigation strategy and concluded with recommendations to engage with SESAR to understand the envisaged options, monitor FAA developments, encourage the development of DME/DME for GA and proposed additional research.

[Action 3: EASA GA Roadmap team to engage with SESAR JU to understand envisaged options and report back to the GA combined meeting.](#)

(4) Publication of information about national parks and environmental protection zones in AIP and Charts

The Austria NAA representative described the situation in Austria with regards to a growing number of areas with sensitive faunas and the challenges encountered by the pilots during flight activities. The presentation pointed out that there are reserve areas at national level with flight restrictions, but not all of them are published as restricted areas in accordance with SERA.3145. Hence, they are not visible in published charts and not visible to pilots and air operators. It was mentioned that the situation in Europe in this respect is very diverse as some states have identified these areas as restricted areas and some others have only an information in the national AIP available or even other states include them only in local legal publications.

The presentation concluded with recommendation for the development of guidance, at the EU level, on how natural reserve areas with flight limitations need to be published in accordance with SERA. 3145.

[Action 6: The participants to disseminate the EASA presentation to the relevant services within NAAs \(ATM, AIS, GA OPS, occurrence management\) and the State with the objective to raise their awareness about the EU aviation requirements and associated issues.](#)

[Action 7: EASA to develop guidelines to support the implementation of the relevant provisions and promulgate it through the most appropriate means.](#)

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(5) Proportionality of ATM/ANS Part-FPD (Flight Procedure Design) requirements - Possibility for smaller entities to design IFR procedures for GA

The IAOPA GA.COM member presented that before the update of the Regulation EU 2017/373 design of IFPD were purely a national obligation following national rules. The updated regulation led to a reduction of the number of organizations or individuals having the privilege to design IFP especially for GA. The cost of certification and amount of work to design RPN procedures were indicated as main challenges, which have increased the cost of work to a limit, where GNSS based IFR procedures are not any more affordable for most of aerodromes with VFR runways.

EASA's initiative to harmonize and increase the safety level of instrument flight-procedure design regarding the heavy commercial aviation segment is appreciated. However, the drawback is that there is at present, no easy way forward for certification of organizations related to design of simple procedures used by GA.

It was suggested that a way forward could be to create certification criteria tailored for smaller organizations with a limited certificate and appropriately limited design privileges to suit the overall needs of the GA community.

[Action 6: EASA to evaluate the compatibility of the proposed solution with the applicable regulations and report back to the next GA.COM & GA.TeB meeting.](#)

(6) Certifying staff (Part-66 L-Licenses) regarding light aircraft (WP07)

As a follow-up concerning the qualification of maintenance personnel, members provided new data to better quantify the problem (i.e., number of affected certifying staff and affected aircraft). It was reminded that Recency requirements of Part 66 are disproportionate.

[Action 8: EASA to set up a dedicated task force with GA.COM and GA.TeB members that will look into the issue with the view to identify mid to long term solution\(s\).](#)

[Action 9: EAS to ask members to contact their NAAs and compile a list why an exemption was not filled.](#)

In view of this topic, the ECOGAS representative reported about the lack of GA mechanics, particularly B2 Mechanics, and on the need to streamline training on common systems e.g avionic suites. Two solutions were proposed. The long term objective would be to amend the B2 licenses, while on a short term, release could be done under a Part 145.

[Action 10: The issues presented by ECOGAS to be analysed and addressed in a close coordination with EM.TEC.](#)

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(7) Licencing and Training requirements for GA

Topic was divided in 3 subtopics:

CBTA concept implementation in GA - challenges and EASA perspective, u

Update on the DTO concept evaluation and

Problems with conversions or validations of FAA type ratings and FAA authorizations.

In his presentation the EAS representative expressed the challenges faced the CBTA concept implementation in GA by providing a brief historical background, the state of play, the problem statement and the proposal.

It was highlighted that the new Basic Instrument rating (B-IR) appears to be a pioneer project, since it has been designed as a full competency-based training. But the only existing material from ICAO is not fitted for GA. Also, the concept is not fully mature and deployed in Europe. And there is a lack of expertise among ATOs providing training to PPL holders and, probably, among the NAAs.

It was proposed to set up a joint taskforce for supporting implementation, share a common understanding of the concept extended to general aviation and elaborate a proportionate methodology. The EASA expert stated that the CBTA concept is applicable to any kind of training. It was mentioned that EASA remains fully supportive of this activity planned to start in the beginning of 2023, however it could not commit to lead it due to resources constraints.

[Action 11: To establish a joint EASA, GA.COM and GA.TeB implementation task force led by GA.COM for CBTA implementation of Basic IR.](#)

The second subtopic covered a follow-up to the DTO concept evaluation. The EASA expert provided a short update on the DTO concept evaluation. The participants were invited to share their feedback. The GA.TeB members supports the evaluation including B-IR.

[Action 12: EASA to initiate the DTO evaluation at the earliest opportunity.](#)

The third subtopic dealt with the problems with conversions or validations of FAA type ratings and FAA authorizations. The GA.COM Chairman queried whether problems with the conversion of type ratings could be possibly solved by the application by the Article 3 of the Regulation EU No 2020/273 when the aircraft is not yet known or certified in Europe. EASA expert clarified that more detailed analysis is necessary.

[Action 13: \(FAA type ratings\) EASA to analyse the presented issue and to outline, if possible, any improvements while respecting the need for proportionality](#)

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(8) iConspicuity update

The *iConspicuity* concept is described as ‘in-flight capability’ to transmit position and/or to receive, process and display information about other aircraft, airspace, weather or support to navigation in real time with the objective to enhance pilots’ situational awareness.

EASA outlined the safety data that triggered activity resulting in EASA strategy.

The participants were reminded about the constraints and boundaries considered in the development of the AMC/GM for SERA.6005c mandating continuous electronic conspicuousness of uncontrolled manned aircraft in U-space. The presentation concluded with the information that the Step 2 of the *iConspicuity* Roadmap is starting now, namely with EASA Research on interoperability of Electronic Conspicuity for GA. Further synergies could be possible with drone technology (e.g., mobile telephony) especially when considering the recently published European Drone Strategy 2.0.

Issues identified for the attention of other TECs and COMs

(1) Air Ops Requirements for GA, Evaluation of the rules for commercial small aeroplane operations under Part CAT and Part SPO

(3) GNSS reversion for GA- Potential synergies with FAA NAV strategy

(6) Certifying staff: We all need mechanics

(7) Licencing and Training requirements for GA: CBTA

(8) iConspicuity update: All AUs need to see each other electronically

Next meeting:

Next combined meeting: In Q2 of 2023 – last week of June, exact date-tbc