



EBF briefing note 2022/02, Issue 1, June 2022

Problems facing balloon engineers under Part 66L

Author: Paul Spellward

Approved: EBF Board 28/06/2022

This document collates concerns of the European ballooning community (pilots, engineers, operators, maintenance organisations), represented by EBF, in the face of disproportionate regulation of balloon engineers under Part 66.

Part 66 with the addition of the “Light” section (Part 66L) came into force for balloon engineers on 1st October 2020. Despite the constraints of working during the pandemic of 2020-21, sufficient experience of working under the Part 66 rules has been gained, such that valid comments and suggestions for improvement can be made.

1. Getting the qualification

- a. The theoretical knowledge paper Module 12L (Radio / ELT / Transponder / Instruments) is not relevant to the L3H and L3G categories since there is no permanently installed avionics equipment in these aircraft categories. This paper should be removed from the requirements for the L3H and L3G ratings.
- b. The published syllabus (“learning objectives list”) for Module 3L – Aviation Legislation has found to be insufficiently specified. It should be updated with a full list referencing all the Rule numbers which are included for the 3L paper, thus eliminating need for study of vast sections of Rules which are not included.
- c. The fixed wing practice of following an in-company “apprenticeship” whilst training for a Part 66 licence does not apply to ballooning. It is difficult or impossible for aspiring engineers in many countries to find a Maintenance Organisation willing to be their “employer”. The rules need to be reformulated for ballooning so that independent study and development, facilitated by a range of organisations including operators and manufacturers, as well as Maintenance Organisations, is admissible.
- d. Unless these issues are solved, the flow of new engineers will be greatly insufficient to compensate for retirements and will leave the sector under- or unserved by qualified engineers in many member states and regions. There is no incentive for current small Maintenance Organisations to train new engineers who may then become a competitor.

2. Keeping the qualification

- a. The licence recency rules 66.A.20(b) are written assuming a high deployment on engineering work, not necessarily full time, but still vastly more than a typical balloon engineer undertakes in the sporting or commercial ballooning environment. “Six months



experience in the previous two years” (rolling recency requirement) is clarified in AMC 66.A.20(b)(2) and can be interpreted as 50 days.

- b. A rolling 50 days experience in the previous 2 years is much too heavy for most balloon engineers and an AltMoC or a new EASA issued AMC is required. Many balloons only have a single maintenance intervention per year, the annual inspection. Many balloon engineers, especially in member states / regions with few balloons, conduct 10 or fewer annual inspections per year, each taking less than one day, so perhaps 50 hours per year. Such very part time, but nevertheless highly expert, engineers are critical to the continuation of the sport and industry and their services must not be lost due to application of a fixed wing, hangar based, employment assumed recency.
- c. The new AMC or AltMoC needs to specify: “for Part 66L engineers working on balloons and hot air airships (L3H, L3G, L4H), a rolling two year recency of 100 hours of maintenance experience is required”.
- d. Many Part 66L licences for balloon engineers were issued under “conversion” of previous national qualifications during 2020-21. The renewal requirements will need to be aligned with the new recency requirements in time for these licences to be renewed in 2025-26

3. EASA plans for additional, heavier requirements

- a. We note with serious concerns that the recent EASA NPA would impose more requirements on Part 66L, including introduction of mandatory stand down periods after exam failures. Application of the full Part 66 approach is not appropriate and should be resisted.
- b. We are most concerned that this process has already advanced too far to be influenced.

EBF proposes a task force be set up, including also other affected sectors such as sailplanes and ELA1 aeroplanes.

We ask for this paper to be included in the 30th June GA TeB & GA COM meeting 01-2022 and discussed at the following agenda item:

Part 66 recency requirements for ELA 1 aircraft

Henrik SVENSSON – EAS / Jannes NEUMANN / Guido MARGIOTTA/ Eugenia DIAZ ALCAZAR – all EASA