Conclusions of work with EASA on the “new interpretation” for Part 66 L engineer recency

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Reminder: Progress from November 2024

- We are proceeding with the “new interpretation” which has recency supported on a task basis as an alternative to a time basis
- FAQ 19023 was updated in November 2025
  - for L-category licences (other than L5),
    being able to demonstrate, in the last 2 years, practical experience, which shall include a representative cross section of maintenance activities relevant to the licence subcategory (B2/B2L, L1, L1C, L2, etc.)

  - *Note: “A representative cross section of maintenance activities” means representative cross-section of the tasks listed in Appendix II to AMC to Annex III (Part-66) “Aircraft Type Practical Experience and On-the-Job Training - List of Tasks”. “Demonstrate” means having a record thereof, such as a logbook. Note: GM 66.A.20(b)2 will be reviewed and amended according to this interpretation through rulemaking task RMT.0735.*

Defining representative cross section of tasks

- Tasks must be those which engineers genuinely undertake
- Task mix can be different for each engineer

- EBF / EGU initial suggestion of task-based recency based on annual inspections was found insufficient for a maintenance licence

- It has been found acceptable to use annual inspections with their planned and rectification maintenance alongside
  - This is a viable formula for the typical sailplane and balloon engineer who works mainly on annual inspections and follow ups
  - Many engineers have a limit on amount of work available in their region / club

- Five meetings & lots of analysis in between

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Detailed analysis of tasks part of, and arising from, annual inspection of sailplanes and balloons.

- EGU and EBF undertook detailed analysis of representative sample of aircraft annual inspections

- Found follow maintenance in 40-50% of annual inspections (20-30 inspection tasks), with typically 1-2 follow-up maintenance tasks involved
- Mapping of follow-up tasks involved to the Part 66 task list showed uneven distribution of task frequency
- Part 66 task list needs to be reviewed and made more representative and complete

- Concluded that over a period of 2 years, sufficient tasks will be touched – based on 6 (sailplanes) / 10 (balloons) annual inspections per 24 months, including follow up maintenance

Proposals for RMT / additional factors

- Task-based recency 6 (sailplanes) / 10 (balloons) annual inspections per 24 months, including follow up maintenance (AMC)
- All engineers should be reminded that they may only undertake task for which they are competent (in addition to being recent on the licence) (GM)

- Ongoing refresher (recurrent) training should be considered (AMC)
  - Should be routine when working under CAO
  - Profile is raised for Independent Certifying Staff

Next steps

- RMT.0735 is launching very soon
  - NPA anticipated before end of 2025

Conclusion

EGU and EBF are pleased with the current proposal from EASA and will support it in the coming RMT**.**

This should solve a current pressing issue for balloon and sailplane engineers.

Positive support from stakeholders in the NPA process is needed!

The need for a separate Part 66-Light remains.

EAS is leading on the next initiative for a simplified (especially training) framework for these “non professional” engineers

Thank you to Jérémie and his team for focussing on this work and for their cooperative approach.

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