



EGU Newsletter 2/2012

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A note from the Editor

This issue of the EGU Newsletter is larger than usual and contains a wealth of information. The highlights are a report from the EGU President on the ongoing discussions between EAS and EASA on appropriate rules for GA as well as an interview with Pete Stratten, CEO of BGA on the implementation of ATO in the UK. What happens in the UK is usually most interesting to all of us, as the Brits usually find simpler solution to EASA rules than in most other countries. EGU would like to hear from other countries on how the implementation of ATO and EASA FCL proceeds.

We hope to publish the next Newsletter in late September. If you have any information/news you would like to publish in the Newsletter, please mail the Editor.

A report from the President

It was my great honour to join the EGU team a short while ago. Since then, I have gradually become more involved in its day-to-day work. My predecessor, Patrick Pauwels, led the team with an impressive level of dedication and commitment for which we should all be grateful. He has certainly made my job of getting involved much easier as a consequence.

The EGU was formed approximately 20 years ago by a group of forward-thinking, internationally-aware people that represented a significant proportion of the European gliding community. They recognised the clear need for a single body to represent the common concerns of gliding and glider pilots across Europe. That requirement has not changed at all since then and our aim is to keep the EGU relevant to its members as the nature of the European gliding "agenda" needs to change.

It is not often that we see far-reaching developments emerging from dealings with EASA that have the potential to be genuinely helpful to the cause of sporting aviation in general, and gliding in particular. A recent development, however, may just deliver something of the sort.

In March 2012 the EASA Management Board (MB) considered a joint paper from Europe Air Sports (EAS) and IAOPA-Europe on the broad subject of the European approach to rulemaking for General Aviation (GA). In terms of scope, this means aircraft up to 5700kg MTOM operated primarily for non-commercial purposes. This of course includes sailplanes.

The first outcome was the establishment of a task group, under the leadership of the DGAC (French CAA), to prepare a paper on the principles and guidelines for the regulation of GA. The group comprises one representative from each of five National Aviation Authorities, two from each of EAS (David Roberts and Jean-Pierre Delmas) and IAOPA, two other GA representatives from E-GAMA and ECOGAS, the European Commission (EC) and EASA.

Whilst there has been no formal report on proceedings - the initiative is still very much work in progress - it is possible to report on what has happened thus far, and the initial, informal views of some of those associated with the initiative as to what progress is being made.

From a process perspective, the group met twice in May and submitted a draft paper to the MB for its meeting on 6th June. The feedback from the MB was very positive and encouraging, and provided the group with some further helpful points to be considered. The group was scheduled to meet again in Paris on 6th July to finalise the paper, which will be submitted for adoption at the MB meeting in September. If the paper is adopted - and there are reasons to think this is very likely - then what is hoped will follow is a process by which the EC will set up a detailed study group to analyse the elements of the Basic Regulation, and supporting Implementing Rules (known as EC regulations) that require amendment. These are well known to our community but a formal review and recommendation process will need to be adopted in the EC. Of course the 'devil will be in the detail'. The timing is important because a five year review of EASA is scheduled for 2013. This time the review will also encompass changes to the Basic Regulation in 2014. So there is a window of opportunity to press for changes in support of the principles and guidelines on GA regulation that are being promoted through this paper.

It is important that the EC takes ownership of this process after September and drives through a programme to implement the required changes. To that end, as a first step, the President of EAS, David Roberts, accompanied by some board members, were scheduled to meet with the EC's Director of Air Transport, Matthew Baldwin, at DG MOVE in Brussels on 12th July, and also the member responsible for aviation in the Transport Commissioner Kallas's cabinet. They were also scheduled to brief several Members of the European Parliament the previous day.

Space here is insufficient to mention other than the core issues being raised, but they will be familiar to all in gliding in Europe. In brief, the topics covered are:

1. Why GA should be treated differently to Commercial Air Transport (CAT)
2. A risk based approach to regulation with a proposed 'risk averseness' hierarchy and a "bottom-up building block approach" supporting a proportionate approach
3. Alternatives to rulemaking in the form of education, communication, mentoring etc
4. Levels of safety and reference to the ICAO framework
5. Grandfather rights and the risk of disenfranchising some pilots
6. Interpretation of the definition of 'commercial operations' in the context of GA, particularly the sports and recreational aviation community
7. Interactions with CAT (airspace related)
8. GA community's responsibilities for safety

The paper then sets out the proposed guidelines to be adopted, with a series of recommended actions. Whilst the outcome of this initiative is obviously still uncertain at this stage, nevertheless there is cautious optimism that, at last, we are being listened to and in particular by the representatives of member states in the MB. It is perhaps the most important high level initiative to evolve since the advent of EASA in 2003, and reflects the results of many years of contacts developed by EAS over this period. We hope to report further, equally optimistic, developments on this initiative in due course.

Whilst regulation continues to be one of the main areas where pan-national co-operation and activity is not just desirable but absolutely necessary, it is not the only area where the EGU can be of direct value to member bodies.

At the workshop prior to this year's congress, we took the first step in developing an initiative aimed at helping us all reverse the decline in participation levels. I and my EGU colleagues will continue to identify ways in which the EGU can support of the work of national gliding bodies.

We can, however, only do that in close and regular communication with you, our members. On joining the team, I wrote to each of the national representative to the EGU. I received a range of interesting and thought provoking responses and I intend to maintain regular contact of the same sort from now on. Of course, if you have any thoughts or ideas, questions or concerns, please do not hesitate in dropping me a line at patrick_naegeli@hotmail.com, or through the EGU website.

Have fun, stay safe.

Patrick



Working Goup Club development

Following the decision at the Congress in Amsterdam a Working Group Club Development has now been established. It consist of

Alison Randle (UK)

Alexander Georgas (Greece)

Arne Wangsholm (Norway)

Robert Danewid will act as “liaison officer” between the WG and the EGU Board for the time being.

The WG has already started their work and in late October a two day working meeting is planned. If you have any ideas on club development, please forward them to the EGU!

A new workshop is planned for Feb 22nd 2013 in Strasbourg.

Proceedings from the Amsterdam Work Shop

These are now planned to be published on the EGU website in late summer or early autumn.

Reminder: New EGU Data Base

Our Secretary General Markus Gnägi has developed a data base with information on EGU members, delegates, National specialists etc. We kindly ask all EGU delegates to check the information in the data base and update it if necessary. Instructions on how to access the data base and how to edit information can be found on the EGU web site in the internal section. If you have forgotten the password to the internal section, please mail the editor of the EGU Newsletter (mail address is in the header).

EASA Part M Task Force

Unfortunately we have no news from the EASA Part M Task Force, which should have finished their work by now. We hope to carry a full report, hopefully with good news, in the next Newsletter.

EASA-FCL and LAPL medicals

EGU request all its members to give inputs on the implementation process in the various countries. EGU will try to monitor this in order to avoid the mess we encountered with the implementation of Part M.

Accident Statistics

We still miss reports from several countries regarding fatal accident data for 2010 and 2011. We would also like to collect if possible, number of accidents, number of members and gliders, launches and hours/year, XC km/year. It would be nice if you can send your statistic to Henrik Svensson, TO Flight safety. henrik.svensson@segelflyget.se



ATO – Approved Training Organisations

The EASA regulations relating to Approved Training Organisations ("ATOs") are entering the final stages of preparation. In a relatively short period of time, national gliding bodies will need to finally determine just what the new regulations will mean for how they are to organise and deliver training in the future.

The precise impact will vary from country to country. In an attempt to begin to highlight some of the possible issues that might arise, the EGU president Patrick Naegeli has interviewed the Chief Executive of one of our member bodies - Pete Stratten of the BGA (right). Some of what he told us about the UK's experience of dealing with the ATO subject may be directly relevant to your own situation, it might even flag some issues that you may need to think about sooner rather than later.



How much of a change does the new EASA regulations on training and ATOs represent for the BGA?

For the BGA as an organisation, there are probably four key changes:

- Moving from self-regulated by consent to being CAA regulated with all the associated compliance related activity changes the relationship between elements of the BGA organisation and the BGA membership
- The BGA, like any other gliding federation, has to run as a business that at least aims to break even. New costs from the CAA and costs directly associated with adapting to EASA regulations require us to modify our business model to both limit the cost to our members and maintain a sensible financial position for the association
- We have been used to governing & managing our own training systems for decades, with CAA involvement limited to that of an 'interested observer'. Our ability to make improvements and modifications to the training system, for example to meet challenges thrown up by the operating environment that no-one contemplated when the syllabus was designed, will be removed. As will our ability to adapt and be flexible in managing our instructors and trainee pilots, for example providing

exemptions to our own requirements where the carefully considered evidence suggests that is the right thing to do.

- And finally after some 70 years of successful management of the medical risks under BGA leadership, the EASA GP medical requirements remove any BGA influence on gliding medical standards.

What are the biggest challenges for the BGA and its member clubs in implementing the new regulations?

Good question. Perhaps these points cover the big issues.

- Referring back to the point regarding the changing relationship between the BGA as a gliding federation and its members, there's always a risk with change brought about by EASA that the BGA, which ultimately has to work with the changes, can be perceived by some to be part of the problem rather than part of the solution! We're very conscious of that.
- The BGA's existing and fit for purpose training organisation will undergo a few significant, but also numerous small, changes in a very short period of time. With human nature as it is, even with the best of intentions it will take quite a while for everyone to adapt to new ways of operating. We only have to consider how Part M is still very new in the minds of most glider pilots even though we've been working with it for a few years now! So there's a significant challenge for everyone there both in compliance terms and in ensuring our safe practices – established over decades of development – continue to be effective under a new set of requirements
- Of course we need to help manage people's expectations, whether gliding club members or national regulators. The track from a smooth running, established and flexible BGA training organisation to a fully compliant, efficient and productive ATO by April 2015 is bound to be turbulent at times! Good communication and reasonable expectations will keep us on glide and, importantly, not disrupt too much of our club training activity or overstress our numerous volunteers.
- The new medical requirements are particularly challenging for those pilots who have existing medical conditions. The BGA needs to support these valued members as the EASA regulations threaten to ground them either through newly established standards that they cannot achieve or because of costs associated with achieving the required expert input and medical certificate.

What are you doing to address these challenges?

Quite a lot, but I'm sure we need to do more. Looking back, we've been fairly proactive by working with our EGU colleagues for the last few years to influence the rules we're now faced with. And we're working closely with the UK CAA to ensure that they are comfortable that the BGA and its member clubs are ahead of the game, understand our obligations and are seen as a responsible and reliable organisation that can be trusted. Well, in so far as any CAA feels it can trust anyone! More specifically, we are;

- Communicating at all levels throughout the organisation. Initially we're scene setting, but as the licensing and ATO rules have become clear and as the UK CAA approach has started to gel, we are able to increase the scope and depth of the information we are providing to club management, individuals and of course our volunteer organisers. We are also in regular dialogue with the UK CAA at all levels both to ensure that they learn more about gliding, which of course benefits everyone, and to ensure there is little room for misunderstanding about the needs of gliding on one side of the scales and the practical implementation of the regulations on the other.
- Ensuring that our existing requirements are not too far removed from the EASA requirements, where of course it is reasonable to do so. So this involves reviewing existing BGA requirements and guidance material with the aim of flattening out what otherwise might be an overly steep learning curve on implementation of EASA rules.
- Working out how best to provide a medical support network. We know from reported experience elsewhere in Europe that a hardening of medical requirements can result in glider pilots who were previously deemed to be medically safe to fly becoming grounded once the new rules came into force, leaving those pilots feeling abandoned. That's something we're very keen to avoid if at all possible.

How are you working with your NAA in this area?

Focusing on the subject of the ATO requirements, we've spent quite a bit of time explaining how our existing single training organisation encompassing all our clubs is an effective model that as well as, importantly, fitting the implementing rules, in many respects mirrors what the EASA requirements can be interpreted as trying to achieve, ie effective governance, control, top to bottom accountability, clarity of purpose and safe practices. That fundamental point has been accepted and is providing us with far less of a headache than if we had to develop 85 approved training organisations complete with all the associated bureaucracy and expense. We're also working very closely with the CAA to ensure that we work together to efficiently manage the transition from BGA certified pilots and instructors to the EASA equivalent licences and ratings. The aim is to minimise administrative burden on the CAA and in doing so limit costs and bureaucracy to glider pilots.

What would you be interested to know about the experience of other countries?

We know we have a lot to learn and it can only be helpful to hear more about our colleagues experiences across all aspects of change. Perhaps those that first implement the changes that we're all working towards could advise us of any difficulties before we have to find them ourselves!

Do you have any thoughts that might be helpful to other countries going through a similar transition?

Listen to the members. Talk to the regulators. Understand the concerns and limitations of both. Communicate. And be willing to modify plans as new information appears. Oh, and maintain a sense of humour even though you know deep down that EASA rules add no value to our sport!

If you would like to share your own thoughts on the matter, please let us know.



Summer is here once again – Fly Safe