



Revision of EASA Regulation 1592/2002

- Executive Summary of the ECA Position-

- **A single aviation market needs a single safety body** - ECA strongly supports the Commission proposals making EASA the *one-stop-shop* for *European aviation safety*.
- **Safety Cannot Wait** - To avoid delaying the extension of EASA's scope, ECA suggests separating the controversial issue of EASA's governance, to deal with it later.
- **Uniform application of OPS rules across Europe** can be ensured by extending EASA's scope to Air Operations. ECA supports the Commission proposals in this direction.
- **EU-OPS Regulation and the further development of Flight Time Limitations must be reflected in the 1592 context**, ensuring that the EP achievements on EU-OPS (such as Art. 8(a)) would not be lost once EASA takes over Air Operations.
- **Aircraft inspections before each flight are essential for safety**. ECA encourages the EP to resist the Council's (preliminary) proposal to reduce the number of pre-flight inspections for a "consistent series of consecutive flights".
- **Extension of EASA's scope to pilot licensing ensures a uniform application of rules** across Member States. ECA supports this, while suggesting to:
 1. ensure that **scientific and technical progress** are taken into account, when Implementing Rules are established - by amending Art. 6(a) §7.
 2. ensure that the *pilots' medical certificates are issued by doctors with aero-medical training and experience* – by amending Art. 6(a) §2(3).
 3. **recognise the rating of pilots involved in pilot training**, thereby avoiding additional burden on flight training – by adding a reference to "rating" in Art 6(a) §5.
 4. not allow assessment bodies **issue pilot licences for recreational flying**, unless they are **delegated by national aviation authorities** – by amending Art 6(a) §2(2).
 5. reject the Council (preliminary) proposal to include **non-technical skills** into formal pilot licensing requirements (Annex III).
- **Imposing common rules to third country aircraft by extending EASA's scope has distinct safety benefits**, as long as ICAO standards are respected and risk of retaliation is minimised. ECA recommends to **regroup all 3rd country related provisions into one article**.
- **Strong collective oversight and enforcement** by EASA are essential to guarantee the implementation of safety rules. ECA also suggests introducing a reference on **effective sanctions for non-compliance** – by amending Art 7.
- **"Protection of the source of information" is a key safety element** in the 1592 proposal. To strengthen this, ECA suggest this protection to also apply to **mandatory** reporting, and a **recital on non-punitive reporting systems** to be added to the text.
- **Flexibility Provisions are important for adapting safety actions**. To ensure that these provisions are not abused, ECA proposes a new requirement for information and **transparency**. Moreover, provisions for granting permanent derogations from EASA safety rules **need to be strengthened, by requiring stronger 'proof'** that the problem cannot be addressed within the framework of existing rules.