



# Air Transport comitology alert December 7th-8th 2010 issues with EASA's proposal

N-FLYERS EUROPE – ASSOCIATION

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# Executive summary

- \* EASA wishes to ban the majority of active instrument-rated private pilots from flying within European airspace unless a costly, complex “conversion” process is performed
- \* EASA, in doing so, severely undermines the ICAO convention
- \* EASA’s proposed regulation will weaken safety by forcing most qualified instrument pilots to restrict themselves to flying under Visual Flight Rules (VFR)
- \* EASA’s proposed regulation will expel some pilots from aviation, ground others and their aircraft, hence:
- \* EASA proposed regulation will cut European jobs in aviation



# ECONOMIC IMPACT

- \* The proposed regulation would severely impact the EU economy:
  - \* A GDP decrease of ~ 200M€ in aircraft operation every year
  - \* 70% of new business airplane sales in Europe would be lost, a portion of which are manufactured in Europe (Dassault, Socata, Pilatus...)
  - \* Thousands of qualified jobs along the manufacturing, maintenance and flight training value-chain will be destroyed
  - \* The economic value loss for existing aircraft located in Europe, newly inoperable, could amount up to 973 M€
- \* This would severely impact an already-suffering sector



# Our expectation

- \* That participants in the decisive comitology meeting of December 7th - 8th 2010 consider the negative effects of the proposed regulation and:
  - \* vote against the proposed “part-FCL” regulation
  - \* ask for a in-depth study on the impact of banning ICAO-compliant GA instrument flights in Europe
  - \* request that an alternative, proportionate European-based system be in place as a pre-requisite to any rule change affecting a robust, pragmatic and safe system.



# The problem

- \* Since the adoption of Joint Aviation Rules in the 90's, Europe has placed very high obstacles to advanced education of private pilots (i.e. instrument rating) by setting disproportionate learning requirements
- \* General aviation pilots have found in the internationally-acclaimed FAA standards a safe and pragmatic option to expand their skills, especially for flight in poor weather
- \* Today, a large portion of new GA aircraft and pilots fly with FAA licencing and N-registration in Europe, while strictly observing and following European airspace regulations
- \* The EASA proposed regulation would destroy this ability



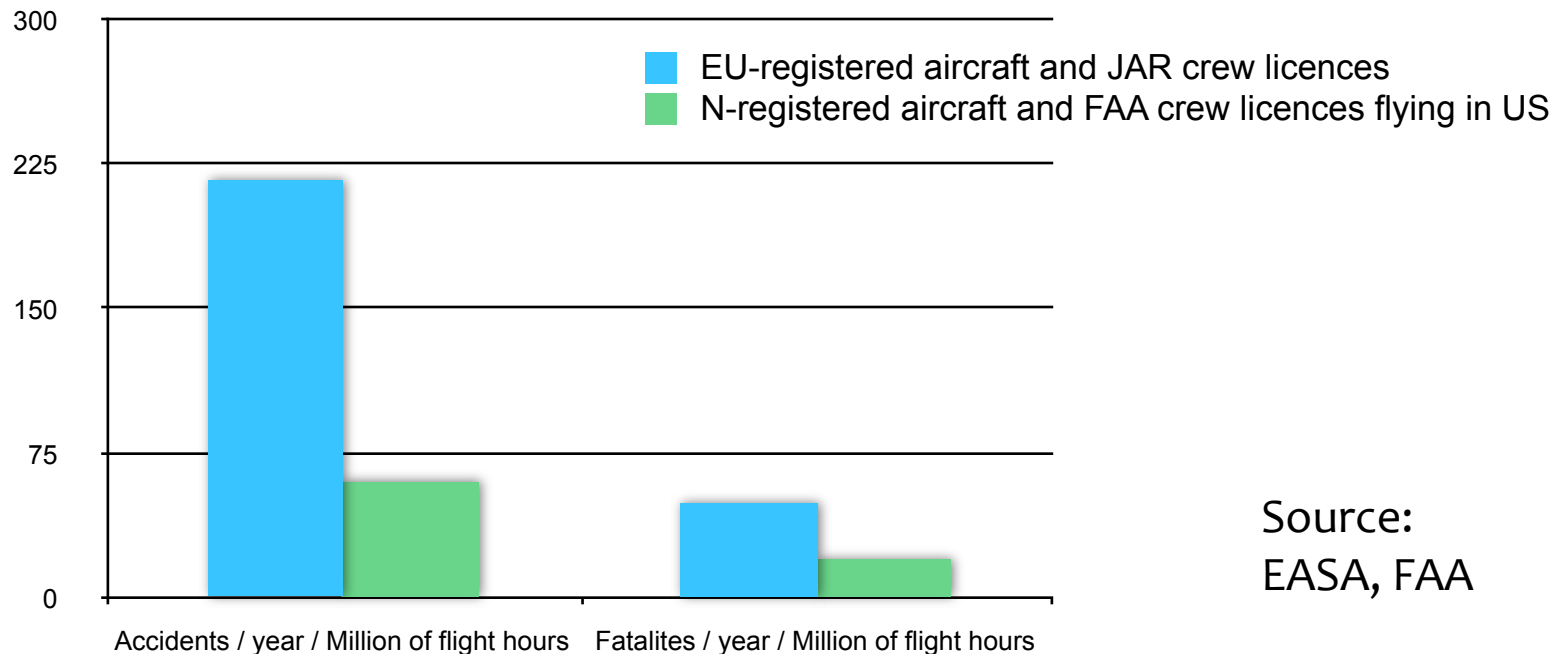
# Facts

- \* Flying with higher-level licences and ratings is **safer**
- \* Flying more modern IFR-capable aircraft is **safer**
- \* Flying with the most up-to-date IFR avionics is **safer**
- \* Flying under Air Traffic Control supervision is **safer**.
- \* Flying with an instrument rating, with separation ordered by an air traffic controller, is **safer** than flying under Visual Flight Rules (VFR) with no ordered separation.



# Facts

- \* EASA's proposals are not based on safety priorities: General Aviation statistics show that FAA's approach is demonstrably safer than the current European record, notably because:
  - \* over 50% of GA pilots are instrument-rated in the US, while
  - \* less than 5% are instrument-rated under the European system



Source:  
EASA, FAA



# Our proposal

- \* Before making any licencing changes, EASA must first enact a set of credible alternatives to FAA licensing
- \* Once obvious advantages will have been established to the future system (FCL.008) and a migration path established, the market will be inclined shift to the advantages of flying European-registered aircraft
- \* Until such time, **we need to sustain the coexistence** as FAA ratings deliver better GA safety and lower fatality rates than the proposed JAR-derived track record.





# About N-Flyers Europe

- \* N-Flyers Europe is the largest pilot association representing FAA licence holders in Europe operating General Aviation (GA) aircraft
  - \* Private pilots
  - \* Professional pilots flying private aircraft
- \* EU-wide organization with additional chapters in Benelux, Switzerland, Germany, Italy, Greece, Cyprus and France
- \* Explicit support from AOPA F, NL, CH, IT, CY, GR, aircraft manufacturers, numerous flight schools, FBO's...



# Our goals

- \* To promote the safety of flight across Europe
- \* To continue the decrease in accident and fatality rates
- \* To maintain the economic efficiencies delivered by business aviation
- \* To develop high-tech jobs across Europe
- \* To evolve in an open sky, as defined by ICAO rules
- \* To maintain open options in flight crew licencing so as to enhance the competitiveness of Europe's offering

*comments ? questions ? kindly contact N-Flyers Europe at [europe@november.aero](mailto:europe@november.aero)*