



Welcome to the February 2012 enews of IAOPA Europe, which goes to 23,000 aircraft owners and pilots in 27 countries across the continent

Aviation unites to challenge EASA fees

The entire aviation world has mounted a concerted challenge to EASA over its scale of fees and charges, which are characterised as inexplicably high and are acting as a major drag on the aviation industry in Europe. IAOPA has joined organisations representing every facet of regulated aviation on the EASA Advisory Body in writing to the Chairman of the EASA Board of Management expressing concern at the damaging effect of EASA's fees. The letter singles out for special attention the wholly disproportionate charges levied on general aviation and demands that they be reduced through a programme of cost-cutting at EASA.

The text of the letter, addressed to Mike Smethers, Chairman of the EASA Board of Management, has been agreed by organisations as diverse as Airbus, the International Air Transport Association, the Association of European Airlines, Rolls Royce and the European Business Aviation Association as well as IAOPA. It indicates that EASA's overheads are running out of control at a time when economies of scale should be bringing them down and points out that EASA's labour charge - €246.38 per hour - is wholly out of scale with labour costs in the industry and twice as high as those of other aviation regulators. It also calls on Europe to accept more bilateral agreements which mean EASA would not spend money re-certificating equipment which has already been acceptably certificated by third countries.

Martin Robinson, who represents IAOPA on the EASA Advisory Body which agreed the text of the letter, says: "We are particularly gratified that our colleagues in the airline world, in aviation manufacturing and in other areas which have up to now not identified closely with general aviation are united on this issue. This makes it very difficult for EASA and the European Commission to ignore. From GA's standpoint, we have always said that none of EASA's major overheads - big offices, large staffs - would be necessary at all if the organisation existed solely for the regulation of GA, so it is unfair that GA should be forced to pay such significant sums towards those overheads."

The letter, signed by Vincent De Vroey, Chairman of the EASA Advisory Board, also calls on EASA to negotiate more bilateral agreements with third-country regulators in order to ensure that it is not spending time and money certifying equipment which has been adequately certificated elsewhere. In addition, it says, duplication of duties and costs between EASA, Eurocontrol and national aviation authorities needs to be tackled.

With specific regard to general aviation it says: "Last but not least, the EAB would like to re-iterate its concern on the high level of EASA fees for general aviation which are unaffordable for this kind of activity. We believe

that the EASA fees for general aviation should be reduced through a complete review of EASA costs, rules, procedures and structures related to general aviation in order to make the fees more proportionate for those kind activities. However, we disagree with cross-subsidies between different kind of activities since we believe EASA fees should be linked to proportionate costs linked to the actual certification activity."

Regional airlines join the chorus

The EAB letter comes on the heels of a supportive stance taken by the European Regions Airline Association, whose Director General Mike Ambrose has also written to the EASA Board of Management saying general aviation faces 'being strangled out of existence if EASA persists in basing its charges for GA at current levels'. He goes on to say that this would have serious implications for the airlines 'as GA frequently provides the seedlings from which air transport pilots grow'. Oversight of GA, he adds, is more relative to car technology than to the 'sophisticated experience and skillset required for oversight and regulation of, say, 777s'.

Martin Robinson, Senior Vice President of IAOPA, says: "We don't always benefit from the backing of companies and organisations such as those represented at the EASA Advisory Body, and when they put forward such an unequivocal case it's hard for EASA to ignore it."



New tax may kill Italian GA

Italy is rethinking its new general aviation tax on foreign-registered aircraft as it becomes clear it will raise far less money than expected and will damage the economy in ways that were not taken into account. This is a good time to reinforce Italy's doubts by writing to your local Italian Embassy pointing out the problems you have with the tax.

The annual tax on private aircraft is part of Italy's response to its economic crisis and supposedly hits only the rich. Unfortunately it applies to all private aircraft that stay in Italy for 48 hours or more, which makes it risky even to transit Italy; a technical problem, bad weather, or an ATC strike could saddle a pilot with a bill for thousands of euros. AOPA Italy members are preparing to shoulder a share of the burden of digging the country out from under the mountain of debt run up by the government, but IAOPA-Europe is opposed to the extension of the tax to non-Italian registrations.

The international response has been partly responsible for the decision to take a second look at the tax. The 'official' calculation says the government will make €85 million from it, but AOPA Italy has calculated the tax on the basis of the number of eligible aircraft and helicopters based in the country at €3,520,000, plus whatever can be raised from foreign-registered aircraft. Set against that the certain loss of tourism income and the picture looks very worrying. Some 10 percent of private Italian aircraft have de-registered since the tax was announced, and the requirement to pay a further €3,000 a year to keep an aircraft will drive more people out of GA.

AOPA Italy is seeking a change to make foreign aircraft pay the tax only after they have spent 90 days or more in Italy, and to have foreign aero club aircraft exempted. Domestically, they want more information on the exact tax levels - for instance, it's not known whether a Piper PA28 with an MTOW of 1,247kg pays the €1.5 per kg tax for the first 1,000 kg plus €2.5 for the remaining 247 kg (€2,117.50) or whether it pays the €2.5 per kg set for aircraft between 1,000 and 2,000 kg on the whole MTOW (€3,117.50). Are historical aircraft and microlights included? Much remains to be settled.

For Italian GA, the future looks bleak. Would you be able to continue flying if you were suddenly faced with an additional bill of more than €3,000 a year, even before you'd flown a single hour? As non-Italian pilot, you can help yourself by writing to your local Italian Embassy expressing your reluctance to visit Italy under the

circumstances, and pointing out the loss of tourist revenue your absence represents. To find the address of the Italian Embassy in your country, click on [this link](#).

The EASA take-over - is your state ready?

IAOPA is concerned that National Aviation Authorities and pilots are ill-prepared for the assumption of flight crew licensing responsibilities by EASA, and indeed are unaware of what will happen and how it will affect them. The deadline to which EASA has been working - April this year - is impossible to meet because national authorities will not have the legal right to issue EASA licences under European law at least until July. Thereafter, they will have a year to decide when to abandon the JAR system for EASA, but it is clear that some states will be unable to implement EASA-FCL until the last minute, while others will be ready to go on day one.

Leaving implementation until 2013, while perfectly legal, causes major problems because the final deadline for everyone with a national licence to have switched to the EASA version remains 2014, so the later states start, the less time they have to complete the process.

Martin Robinson says: "Looking around Europe it is clear that some NAAs are a long way from ready. They haven't yet synchronised their computer systems or even harmonised their paperwork. There is talk of some countries applying for an Article 14 exemption to allow them to 'file a difference' with EASA, but this is not an option - Article 14 only covers safety-critical issues.

"Pilots holding national PPLs will have until July 2014 to convert them to EASA licences, but be warned - if you have a rating on your licence that is not current when you apply for an EASA version, the EASA licence will come back without that rating on it. Unless you're prepared to lose a rating, ensure that it is current when you make the change.

"And don't expect to get your licence back by return of post. The law now requires national authorities to 'verify' any ratings on your licence, which takes manpower, time and money. Bear in mind that every time you return your licence to the national authority for whatever reason - change of address or whatever - they will have to verify your ratings, so you will pay again.

"While some countries, like Germany, intend to leave implementation until 2013, others, like the UK, will adopt it in July this year. It remains to be seen who's doing the wisest thing; the UK's overnight adoption of the JARs was undoubtedly a major mistake which caused serious disruption and significant waste to industry because the original JARs were flawed in so many ways. Is EASA-FCL any better?

"People who are currently in training in countries like the UK may wish to consider what happens if they apply for a licence between April and July this year. Despite the fact that it is after the original EASA deadline, they will be issued with a JAR licence because their national authority can't by law give them anything else. That will be valid for five years, after which they will be able to exchange it for an EASA licence, valid for life. "The changeover is characterised by the same sort of muddle that attends all too much of EASA's works, and it is something that should have been got right because for insurance purposes there needs to be certainty in regulation. But at the PPL level it is relatively simple compared to what commercial pilots, instructors and others will face. Then of course we've got the instrument flying issues to look forward to."

Is your state ready? Do you know what will happen to your licence, and by what date? Get in touch with your NAA to find out.



EC should help pay for 8.33 radio

Europe is pushing ahead with SESAR, and as we have been reporting, the first impact for GA is likely to be the requirement to retrofit with 8.33 radios - something that will affect over 50,000 GA aircraft across Europe by 2017. Under European Community rules, those who are forced by new regulation to pay out money when there is no benefit to them can be assisted with European funds. This is the case for 8.33 - general aviation is forced to equip for the benefit of the commercial users of airspace. IAOPA has proved that for GA, there is no business case for 8.33, and in fact through the excellent work of AOPA Germany on frequency allocation, it is clear to IAOPA that if centralised frequency management was adopted there would be no need for GA to equip with 8.33 at all. States are, however, reluctant to give up their frequency allocation function. The EC has now said that if there is no positive business case for GA, they will consider how funding could be made available. Exactly how that might work is open to question, but IAOPA will continue to press the Commission to follow its own rules and accept this responsibility.

Flight plan form changes

Eurocontrol is changing the flight plan form from November this year. The new form was presented at a Eurocontrol meeting in January attended by Dr Michael Erb of AOPA Germany; Dr Erb reports that there is nothing dramatic about the new form. "It's mostly a change of indicators in some fields, but there are some improvements," he says. "For instance, you will be able to file a flight plan 120 hours - five days - in advance."

For full details, click on [this link](#).

World Assembly in South Africa

The next Regional Meeting of IAOPA-Europe takes place in London on Saturday March 10th, and everyone is welcome. The big event this year is the biennial IAOPA World Assembly, which takes place in Cape Town, South Africa, between April 10th and 15th 2012. The World Assembly is an opportunity for the 69 AOPAs around the world to get together to discuss a common approach to the problems facing general aviation. Airport and airspace access, security, user fees and the environment are the major issues scheduled for debate at this important forum, and experts on each topic will address the Assembly. At the end of the conference, which takes place at the Spier Hotel in Stellenbosch, there will be an opportunity to visit Stellenbosch Flying Club, where flights over the Cape area can be arranged in fixed-wing aircraft and gyrocopters. AOPA South Africa has also arranged with local travel experts to create bespoke tours for delegates who wish to spend longer in South Africa. For full details and registration information see www.iaopa2012.co.za