HAES ISSUES FOR DISCUSSION

ICAS PC MTNG. – FLIGHT SAFETY WORKSHOP

MYKONOS ISLAND - GREECE

(October 2005)
In the aftermath of the recent tragic air crash near Athens and while major changes are taking place in the local legislation regarding airworthiness requirements (Presidential Decree 147 issued 16 August 2005), our Society is very strongly concerned with what we feel to be a relaxation of requirements for the qualification of airworthiness inspectors of the competent authority (i.e. the Hellenic CAA).

In this regard, we would like to discuss some aspects of the relevant European regulations, as well as ICAO recommendations, and how these are / should be properly interpreted and implemented in practice.
Two main topics are of concern:

1. Educational qualification requirements for airworthiness inspectors:
   - an appropriate Part-66 licence or aeronautical degree or equivalent is only desirable according to the recent P.D. 147 / 2005 in Greece
   - according to the EU regulations, the above qualifications are mandatory. Moreover, for a Part-66 licence to be considered as equivalent to an aeronautical degree (for the purposes of fulfilling airworthiness inspector requirements), additional education is required
we are particularly concerned with the definition of such additional educational requirements:

- they are not explicitly defined in the relevant regulations
- typical «continuing education» type seminars of limited duration (3-4 weeks), designed and aimed to staff with an already strong basic educational background, are not adequate to fulfill the additional education requirements
2. Interpretation of continuing airworthiness experience requirement

- the five year experience requirement in continuing airworthiness of EU (EASA) regulation 2042 / 2003 is interpreted by the recent Presidential Decree 147/2005 merely as five years practical work experience in an aircraft maintenance shop
we are concerned that the airworthiness inspector must have a much wider and higher level educational background on aircraft airworthiness, as well as experience covering all aspects of airworthiness, such as and not limited to:

- regulations, rules, procedures and certification specifications
- documentation and quality systems
- engineering tasks including repair schemes,
- organization review, airworthiness management, audit techniques, etc.

beyond a limited experience on the execution of specific technical tasks (whether line maintenance, specific aircraft component shop, etc.)
HAES shall appreciate the panel’s views and recommendations on the following minimum requirements for airworthiness inspectors:

1. Basic and / or additional education standards

2. Continuing airworthiness experience

Thank you for your attention