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Aan: airworthiness directives <ADs@easa.europa.eu>
Onderwerp: EASA PAD No. 10-010
Comments by European Gliding Union on

EASA PAD No: 10-010 Equipment & Furnishings – Safety Belts / Torso Restraint Systems – Inspection

Dear Sirs,

On behalf of all its subscribing National Gliding Federations, the European Gliding Union wishes to add its support to the concerns already raised by several air sport users/organisations in respect of PAD 10-010 – Equipment and Furnishings. This proposed measure would involve a significant majority of the estimated population of some 18000 sailplanes operated in Europe, not to mention an unqualified proportion of the light aircraft fleet.

The EGU finds this PAD to be a wholly inappropriate measure since only formal, administrative arguments are presented in justification of the proposed directive. There is no technical justification given within the document. It is wholly inappropriate and disproportionate to force owners to remove reconditioned harnesses unless EASA has proof of a genuine unsafe condition to warrant doing so. Further, the corrective or alleviating measures proposed are unrealistic in both cost and timescale, and would undoubtedly result in the grounding of a very large number of aircraft pending this action.

The design requirements for sailplane harnesses are clearly specified in CS-22.785. The repair of harness webbing is a simple process involving replacement with similar specification material. The stitching, if not available in a component maintenance manual, reverts to standard practice. We are unaware of any problems experienced by aircraft owners with regard to these harnesses over many years. Gadringer Gurte GmbH, LTB Schleman and others have been maintaining/repairing safety harnesses for sailplane owners for over 40 years by procedures now approved by EASA and, before that, by national regulation, and presumably subject to airworthiness audit.

A key role of EASA is to ensure safety in European aviation under acceptable provisions for the owners and operators of the aircraft. We would expect that this entirely administrative issue should be rectified by appropriate administrative measures. Measures should be prepared considering the related financial burden in respect of the lack of evidence of any identified safety risk. If any AD is deemed necessary, it should, as a minimum, identify realistic options for retrospective adoption of a maintenance procedure to avoid the exchange of all safety belts implicated. Further, if owner action is necessary, we would recommend that a process based on an 'On Condition' type of inspection, supported by proper guidance for the manufacturer(s) might be considered.

Yours sincerely

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