

Mrs. Violeta Bulc
European Transport Commissioner
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

05.03.2018

Re: Non-compliant release to service

Dear Ms Bulc

Our members bear the responsibility for operational engineering flight safety, and act in that capacity on behalf of EASA to ensure that its regulations are fulfilled. We write to you as a last resort in pursuit of our duty to protect commercial airline passengers. Their lives are being placed at risk by the deliberate dilution of the safety procedures mandated by EASA by the national agencies of certain European countries; which EASA has proved powerless to address. Without intervention by you, we fear that only a disaster will spur the responsible authorities, and that is a price European aviation should not be made to suffer.

As you will be aware, when maintenance is performed on aircraft, the existing rules require that a licenced engineer verifies that such work has been properly carried out before the aircraft is permitted to operate. For this purpose, verification has always meant that the certifying engineer has either supervised or personally checked work that has been carried out and decisions that have been made to defer such work. As EASA has made clear in its circular of December 2015, verification "is not just an administrative task which can be performed from a remote location or without having been involved at all". The privilege of releasing an aircraft to service is a qualification earned after years of training and experience.

Engineers empowered to release aircraft into service as a result of this verification procedure take personal responsibility by executing the certificate for release to service as to the safe condition of the aircraft, which carried with it a heavy burden of responsibility. There are numerous instances of such engineers being prosecuted in Europe for breach of their duties in this respect. Inevitably, their seniority and responsibility in the process, and the fact that they must personally check work that has been done adds significantly to the safety of aviation operations at the expense of some additional cost.

Commercial aviation operators are under constant pressure to reduce costs. Having licensed engineers check worksheets instead of the work itself saves time and money. Various national European authorities now approve this as sufficient "verification" even though the practice is clearly in conflict with EASA's stated intention, and the meaning of the word "verification". Safety is being degraded by reducing the most senior experienced engineer to a tick box functionary. This practice has led to tens of thousands of documented examples of aircraft being released into service inappropriately.



Our concerns in this respect have been addressed to EASA in the past and we attach a copy of a letter we sent some time ago to Mr. Patrick Ky. EASA set up a working group to evaluate the situation and in addition carried out audits of Turkish Airlines and Luftfahrt Bundesamt in 2015. Both audits found non-compliance with the regulations in this area. Because of its direct authority in Turkey, EASA was able to insist that Turkish Airlines comply with the regulations, which it now does. The audit finding in relation to the LBA remains open (which in itself represents a breach of EU regulations) and the practice regarding release to service by checking documentation remains in place in Germany. Similar practices have now taken root in other European countries, the airlines of which have been emboldened by EASA's inability to insist that the LBA follows the rules.

EASA has tried and failed to enforce its regulation regarding "verification" on national authorities, and cost saving has thereby been allowed to dilute safety standards in Europe. Inevitably the erosion of safety standards has and will cause incidents. Only positive action at the highest levels of the Commission will ensure that national authorities return to compliance and enforce that compliance on their member airlines. Please help us to ensure that this issue is not allowed to drift until disaster provides the spur to action.

Yours sincerely

Ola Blomqvist
President, AEI

Sean Gates
Gates Aviation