



# European Aviation Safety Agency

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Cologne, 26 March 2009  
JMC/xfi (R3) 2009 (D)60075

**Subject:** Extension of the comment response time of NPA's OPS, OSC and AR-OR

Dear Members of AGNA/SSCC,

Over the past weeks the Agency has organised several meetings in Cologne but also in different Member States and we have noticed that the NPA-proposals have been triggering a lot of discussion and also need a lot of explanation. Many operators and other aviation organisations, as well as individuals, are now for the first time in direct contact with EASA and have to deal with the new proposals and the EASA procedures that are in place which is quite challenging for some organisations. If you are relatively new in the EASA-system you need time to find your way. For some organisations the proposals come as a surprise because they were not yet really aware of the requirements the Agency had to comply with due to the timeframe set by the European Parliament, the Member States and the European Commission. Besides the proposals of the different NPA's that imply a certain change over time, the economical crisis is also facing the Industry with enormous financial difficulties, cut in staff etc.

The Agency has to comply with the timeframe as set out by the European Commission and is also of the idea that the proposals in the NPA's will at one hand enhance Safety and finally also contribute to a reduction in the costs. At the same time we do realise that the Industry at large, needs more time. Therefore the Agency has taken the initiative and discussed with the European Commission possible ways of alleviating the time pressure on the stakeholders. The main issue that could contribute to the time squeeze is a change to the time-limits set in the Basis Regulation (7 April 2012). These time-limits dictate the presently used schedule. We are going to propose to the commission an adapted timeframe.

As a first step, we postpone the end of the comment periods for the OPS, AR/OR and OSC NPA's to the following dates:

NPA 2008-22a to -22e (AR/OR): 28 May 2009

NPA 2009-01 (OSC): 30 June 2009

NPA 2009-02a to -02g (OPS): 31 July 2009

Yours faithfully,

J. KNEEPKENS

### Publication of Notices of Proposed Amendment (NPAs)

This table gives the proposed dates for the end of the comment periods and the best scenarios for the adoption of the regulatory material that is being prepared. It is based on 3 months to develop the CRD and 2 months to publish the Opinions as provided for by the rulemaking procedure. A further 9 months are planned for the adoption through comitology. This table does not foresee any groupings the Commission might choose to make to limit the number of procedures or any delay in the adoption due to the comitology procedure.

PUBLICATION DATE	TITLE	END OF COMMENT PERIOD	OPINION TO COMMISSION	PUBLICATION OFFICIAL JOURNAL
05 JUN 2008	<i>Pilot Licensing NPA 2008-17(a)-(c)</i>	28 FEB 2009	AUG 2009	MAY 2010
31 OCT 2008	<i>Organisation Requirements and Authority Requirements NPA 2008-22(a)-(e) (general elements and those related to NPA-2008-17)</i>	28 MAY 2009	NOV 2009	AUG 2010
16 JAN 2009	<i>Operational Suitability Certificate (21.039)</i>	30 JUN 2009	DEC 2009	SEP 2010
30 JAN 2009	<i>Air Operations (OPS.001); Organisation Requirements and Authority Requirements (elements related to air operations)</i>	30 JULY 2009	JAN 2010	OCT 2010
16 APRIL 2009	<i>Third Country Operators (OPS.004)</i>	16 JULY 2009	DEC 2009	OCT 2010