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## TIPS FOR EUROPEAN RAMP INSPECTIONS

For companies flying to Europe, knowing the EASA rules and documenting compliance makes SAFA ramp inspections go more smoothly.

# TIPS FOR EUROPEAN RAMP INSPECTIONS

Non-European Union-registered aircraft operators are subject to Safety Assessment of Foreign Aircraft (SAFA) ramp inspections when operating in European Union (EU) member states, plus Iceland, Norway, Switzerland and any state with which the European Aviation Safety Administration (EASA) has a working arrangement on SAFA.

“SAFA ramp inspections can be challenging for some U.S.-registered aircraft operators, particularly if they are unprepared and approach the ramp check from the wrong perspective,” said Doug Carr, NBAA’s vice president of regulatory and international affairs. “Doing a little homework before flying to states that utilize EASA SAFA inspections can help ensure a successful check.”

## DO YOUR HOMEWORK

What can you do to prepare for a ramp check in Europe? What are the common stumbling blocks for U.S.-registered aircraft operators?

“The greatest key to making a SAFA ramp inspection go smoothly is to be prepared,” said Steve Thorpe, a Gulfstream G550 captain and former chairman of the NBAA International Operators Committee. “As soon as an inspector sees you are prepared, you’re more likely to have a successful check.”

Both Thorpe and Nat Iyengar, a member of NBAA’s Access Committee, recommend reviewing EASA’s guidance on ramp inspections, which includes a list of inspection items. Operators should use that list to prepare a concise guide to inspectors on where each inspection item is addressed, whether it is in a manual, a checklist or a physical location on the aircraft. A best practice is to have a binder or electronic document that follows, point-for-point, the SAFA ramp inspection items list.

“The biggest issues generally occur when the inspectors come to the plane and the crew has nothing prepared,” said Iyengar. “The inspection probably won’t go well if the crew members are digging around for references.”

## A MATTER OF PERSPECTIVE

Iyengar emphasized the importance of perspective in avoiding common findings.

“Pilots tend to look at the inspections from the FAA perspective, not the ICAO [International Civil Aviation Organization] perspective, as EASA does,” said Iyengar. “If you approach it from the ICAO perspective, you will be ready for the differences [between FAA and EASA requirements].”

Some of those differences include demonstration of qualification and currency and flight planning activities.

One common problem for U.S.-certificated pilots is EASA’s lack of a grace period for medical certificates and training events. In the U.S., a first-class medical issued on Dec. 10, 2016, is valid for six months, plus a grace period until June 30, 2017. The FAA also allows grace periods for training events. EASA, however, has no similar allowance. A medical issued on Dec. 10, 2016, and valid for six months expires on June 10, 2017. A check ride completed on June 1, 2016, and valid for one year means an aviator should take another check ride by June 1, 2017.

Pilots should also be prepared to prove their qualifications, not just by providing their airman certificate with related ratings, but also by providing proof of current training and checking, if required. For Part 91 operations, this means a valid Part 61.58 proficiency check, if applicable. For Part 135 operations, this means valid training and checks, including those required by Part 135.293, 135.297 and 135.299, as applicable to the pilot’s duty position.

Another common qualification concern is for pilots who require eye correction to fly, as noted on their medical certificate. Pilots requiring eyeglasses or contact lenses must have a spare pair available in the cockpit. A spare pair is not required in the U.S.

## FLIGHT PLANNING DIFFERENCES

Fuel planning for alternate airports is another possible stumbling block. Most flight planning vendors and software assume if an alternate is needed, the pilots will fly directly from the destination airport to the alternate. A total of 45 minutes’ worth of fuel is added to the fuel needed for that direct route. EASA requires fuel planning for the most likely route to the alternate, plus 45 minutes of fuel.

It’s also important for fuel levels at takeoff to match the planned amount. Sometimes pilots request extra fuel or have fuel off-loaded. Planning calculations must be adjusted appropriately after these changes are made to be consistent with the fuel on board at the time of the ramp inspection.

Pilots should also be prepared to show accurate weight-and-balance calculations, even for Part 91 operations. Although Part 91 requires a pilot to fly within the operating limitations of the aircraft, the requirement to prove in writing that an aircraft’s weight-and-balance calculation is within these limits represents a key difference between FAA and EASA or ICAO requirements.

Finally, properly notated journey logs and master documents are necessary if the flight originated overseas.

“You can’t look at this inspection through an FAA

lens,” said Iyengar. “The FAA is very clear – when flying internationally, a pilot must operate under the more restrictive requirements, whether that’s the FAR or the state regulations in which you are flying.”

### UNDERSTAND THE FINDINGS

A SAFA ramp inspection may result in “findings,” which are classified by severity. It’s important to understand the different categories of “actions” that result from an EASA ramp inspection.

- A Class 1 action is simply provided as information to the aircraft captain. All SAFA ramp inspections result in a Class 1 action, even those with no findings. The inspector provides the pilot with a Proof of Inspection (POI) document that may or may not include findings.
- A Class 2 action is information to the aircraft operator and to the aviation authority under which the aircraft is registered. In this case, the FAA receives a copy of any Class 2 action received by the operator of any U.S.-registered aircraft.
- A Class 3 action is the most severe. EASA considers these findings to have a potential major effect on safety,

and an inspector may require remedial action be taken before an aircraft can depart. A very serious Class 3 action can result in the aircraft being detained by the aviation authority or the operator or aircraft being banned from operating in EASA airspace. Class 2 and Class 3 actions typically require follow up by the operator.

If you fly to Europe, the value of understanding SAFA ramp inspections and being prepared cannot be understated.

“Have your i’s dotted and t’s crossed as far as what ICAO and EASA require,” said Thorpe. “Be aware of and familiarize yourself with the guidance EASA provides on SAFA checks.”

Pilots who take time to be prepared are likely to view a SAFA ramp inspection as a non-event. If an operator is prepared, an inspection should only take 15 to 30 minutes. ✨

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**Review EASA guidance material at [easa.europa.eu](http://easa.europa.eu). Review NBAA’s international operations resources at [www.nbaa.org/ops/intl](http://www.nbaa.org/ops/intl).**

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## Minimum Equipment Lists: FAA Approval Does Not Ensure International Compliance

Do you operate with Letter of Authorization (LOA) D095 to use a minimum equipment list (MEL)? Part 91 operators may request FAA authorization through LOA D095 in order to defer repairs of and consequently fly with certain inoperative equipment.

The D095 LOA is an acceptable method of deferring maintenance for domestic operations, but using a D095 to fly internationally, especially to Europe, requires additional attention.

It’s important to understand that a Part 91 MEL approved under D095 consist of the following elements:

1. The FAA D095 LOA, which authorizes the operation of the aircraft specific to the aircraft make, model, serial number and registration number;
2. The MEL procedures document, developed *by the aircraft operator* and including maintenance and operations (M&O) procedures;
3. Policy Letter PL36, the Part 91 master minimum equipment list (MMEL) preamble, which can be obtained from the FAA Flight Standards Information Management System (FSIMS) website; and
4. The MMEL itself, as developed by the aircraft manufacturer and the FAA.

Combined, these four components create an MEL for Part 91 operations approved by the FAA using D095. *All four parts must be kept on the aircraft to comply with the*

*D095 LOA.* The MEL procedures document is developed by the operator, typically using guidance provided by the manufacturer (e.g., a dispatch deviation guide). Third-party resources are often helpful in developing a procedure document tailored to your aircraft and operation, and then packaging each of the above items into a complete MEL document.

One critical aspect of a Part 91 MEL, as far as EASA is concerned, is the M&O procedures section, which is operator-specific.

“Reports indicate that EASA’s concerns with Part 91 minimum equipment lists revolve around the lack of operator-specific M&O procedures and pilots being unable to address SAFA inspector questions,” said Doug Carr, NBAA’s vice president of international and regulatory affairs. “Simply having authorized, operator-specific M&O procedures doesn’t ensure compliance. Pilots must be familiar with the procedures and be able to explain to a SAFA inspector how the MEL process and M&O procedures work.”

Operators must also include any supplemental type certificates in the MEL and tailor the MEL to the equipment installed on their aircraft. For example, if you install a new avionics system on your five-year-old aircraft, that item may not appear on the MMEL developed by the FAA and the manufacturer. Such an aftermarket



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installation must be included on the D095 MEL for operations in Europe.

Additionally, EASA's focus on performance-based standards included in the International Civil Aviation Organization's (ICAO) Annex 6, Part 2, Chapter 2.5 requires operators to have "information relevant to the airplanes required communication, navigation or communication specification capabilities included in the MEL." This standard requires the operator to take a broader view of specific equipment and its relationship to other systems and performance requirements.

Developing an aircraft-specific MEL, approved through LOA D195, is another option for ensuring that your MEL is acceptable to EASA inspectors, but obtaining a D195 is not necessarily an ideal alternative. A D195 is subject to more frequent FAA scrutiny, and FAA approval can take up to 30 days. Maintaining a D195 requires ongoing attention and effort from the operator, with MEL updates required for each MMEL revision published, as well as re-approval from the FAA following each revision.

"NBAA is actively engaged with the FAA, EASA and

ICAO to identify how the U.S. system of managing minimum equipment lists can address the concerns identified by EASA," said Carr. "In the meantime, we encourage Part 91 operators to be in full compliance with their D095 LOA – all four elements – and train their pilots on how to use the MEL so they can appropriately answer SAFA inspector questions."

EASA is not the only regulatory authority that has expressed concern about the D095 MEL. China, India and other countries also follow ICAO standards and have identified concerns similar to EASA's.

While EASA provides a SAFA ramp inspections checklist that is specifically developed for commercial operations, EASA recommends that member states use this guide to inspect general aviation aircraft until a non-commercial operations SAFA checklist is developed. Differences between commercial and non-commercial compliance items are identified for inspectors. ❖

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**Visit the FAA FSIMS website at [www.fsims.faa.gov](http://www.fsims.faa.gov). For EASA's checklist, download the SAFA Ramp Inspections guidance material at [easa.europa.eu](http://easa.europa.eu).**

## About NBAA

Founded in 1947 and based in Washington, DC, the National Business Aviation Association (NBAA) is the leading organization for companies that rely on general aviation aircraft to help make their businesses more efficient, productive and successful. Contact NBAA at 800-FYI-NBAA or [info@nbaa.org](mailto:info@nbaa.org).

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