

## **AOPA-Germany's Comments on EASA PAD No: 10-010**

AOPA-Germany strictly rejects PAD10-010, Equipment & Furnishings - Safety Belts / Torso Restraint Systems – Inspection.

The above mentioned PAD would have an extremely negative impact when coming into effect as published. Thousands of General Aviation aircraft are equipped with Safety Belts produced by the named manufacturers and maintained or repaired by the affected organisations. After a first estimate we believe that more than 30.000 Safety Belts would need to be exchanged in German registered aircraft.

As certified replacements for these Safety Belts are not available within the set deadline of three months in the needed quantity, the affected aircraft would have to be grounded.

If there were indications that safety was compromised by the affected Safety Belts, immediate action had to be taken and AOPA-Germany would support this action. But there is no indication at all that a safety issue exists. Even EASA does not request immediate action and opens a discussion with the stakeholders on the topic.

Instead the heart of the problem seems to be merely an argument on “formalities” between EASA, National Authorities, Safety Belt Manufacturers and Maintenance Organisations. Aircraft operators simply must not become victims of this argument. Since 2003 EASA is responsible for Airworthiness of Aircraft in Europe. Most of the affected Safety Belts were maintained under authorisation of the German Luftfahrtbundesamt, already many years before EASA took over its responsibility in 2003. So it's not understandable why even these Safety Belts repaired and maintained before 2003 should be affected by a conflict the maintenance organisations presently have with newly created EASA regulations.

Because all affected aircraft operators had their Safety Belts maintained and repaired in good faith by organisations under the oversight of the Luftfahrtbundesamt and/or EASA, the question of liability claims against Luftfahrtbundesamt and EASA will definitely arise when the PAD comes into force as drafted.