

From the AEI Secretary General, July 2011

It's been a while since I wrote my previous report but with all the things happening I feel that with the congress approaching an update before my final report at congress is justified. As usual a number of Hot Issues are on the table that draw our attention.

MEL:

Most sensitive is the item about the abuses of the MEL in relation to the pilots not reporting defects when they occur but when convenient. Some survey has been done locally pointing out that the situation is continuing to degrade. With ever more airlines fully rely on pilot's pre-flight check on outstation as well as many also have removed Pre-Flight check at home base from the engineers. In some case aircraft are not inspected by unbiased technical staff but only by pilots.

More and more airlines under pressure to perform on time departure put pressure on pilots not to report many defects unless absolutely unavoidable. This is reported to us by many pilots themselves who often do not feel comfortable but feeling the pressure "young" pilots are not keen to put their job and promotion on the line.

Pilots not reporting Defects.

As just mentioned we performed some local surveys; however to progress this issue we require additional up to date evidence. I am asking you as our affiliates to assist AEI in this. I will send a request to each affiliate personally in the coming weeks. The AEI board would like each affiliate to do a logbook check, preferable over about a 3 month period, of 2 or 3 specific registrations and count flights, defects, and on which leg the logbook defect where written into the logbook. If this proves to be difficult, then please perform approx 30 logbook entries checks on different aircraft.

We would appreciate it if each affiliate attending congress were able to provide their findings at the congress in order to present proper conclusions to the authorities. All information will be de-identified by AEI and only used for internal use. Nobody but AEI will have access to this data.

ITQI:

IATA and ICAO have recently produced documents with what they call solutions to solve the expected shortage of technical staff and pilots that is foreseen with the expected growth of aviation as well as the age build-up of the staff in many airlines and maintenance organisations. They consider "competency based training" is the answer. This is only a way of solving financial burden reducing costs of education and training.

Nothing is mentioned in the entire piece about how to retain the quality of training and keeping the standards to an acceptable level. The fact that IATA as the Airlines main organisation has made a street crossover to ICAO which should be an independent aviation organisation under the UN flag, highlights the influence airlines have on the industry. This is often based on what is good for the shareholder of the airlines and not what is good for aviation.



Of course one can train a monkey to ride a bicycle not to maintain one. If competency based training methods are used, you train a mechanic to replace parts, without them properly understanding the often critical interaction between various systems. The background knowledge necessary to comprehend this relationship is no longer part of basic training.

This will undoubtedly lead to an increase in dangerous situations resulting in death and injury not only to fellow staff members but will also cause aircraft incidents and accidents. Especially seen in the light of developments where more and more maintenance organisations attempt to remove B1 and B2 staff members because understaffed and underfinanced authorities do not perform the necessary oversight to the required standard.

EU working time directive.

AEI has requested that EASA incorporates the EU Working time directive into Part 145. This is law in all EU countries but often “forgotten in many Maintenance organisations”. We need to protect our colleagues.

Cases where people working on aircraft systems continuously for over 40 hours, people working 61 days 12 hr. shifts without 1 day off, continuous night shift for many months and numerous other abuses of sensible working time limitations should cease. Unions have fought for many years to ensure sensible working periods and time off are enjoyed, don't allow greed to give these gains back.

The mentioned working time limitation are not that strict since a large number of European countries have much stricter rules but having it in the Part 145 at least makes the accesses controllable.

Under the EU's Working Time Directive (2003/88/EC), each Member State must ensure that every worker is entitled to:

- ***a limit to weekly working time, which must not exceed 48 hours on average, including any overtime***
- ***a minimum daily rest period, of 11 consecutive hours in every 24***
- ***a rest break during working time, if the worker is on duty for longer than six hours***
- ***a minimum weekly rest period of 24 uninterrupted hours for each seven-day period, which is added to the 11 hours' daily rest***
- ***paid annual leave, of at least four weeks per year***
- ***extra protection in the case of night work (for example, average working hours must not exceed 8 hours per 24-hour period; night workers must not perform heavy or dangerous work for longer than 8 hours in any 24-hour period; there should be a right to free health assessments and in certain situations, to transfer to day work).***



Access to EU documents

AEI has requested access to EU and EASA documents in its endeavour to uncover serious safety problems. Despite nice words from people such as Mr Patrick Goudou, Executive Director of EASA and Mr Siim Kallas, VP of the EU Commission that they promote the sharing of safety Data, in reality when this information is then requested by AEI, they hide behind the “commercially sensitive” wall.

It is absolutely in the “interest of safety” to share information of which maintenance organisation is not adhering to EASA regulations. It is unacceptable for regulators to hide this information from the travelling public. We now have requested access to the information via the European Ombudsman process because AEI believes that name and shame definitively has a positive effect and works as a deterrent to companies considering dropping below acceptable standards. One thing they wish to prevent is negative publicity.

Language translation of Maintenance manuals.

We received information that in a number of European Countries Maintenance organisations, colleagues are working with translated maintenance manuals or task cards. The problem with this is that first of all, maintenance manuals are controlled data and when performing maintenance you may only use controlled data.

Some companies are apparently accepting some very strange translations which have obviously been translated by non technically minded individuals. We have received information that some even work with only the very basic translation of an instruction rather than the official text as contained in the manual. We have requested from EASA a statement about their position on this.

For example in some countries workers can demand that the working instruction and task cards are in their national language. This safety risk has to be eliminated either by the use of very good technically competent translation companies or by ensuring each mechanic or engineer has a good understanding of the English language.

Whistle blower protection

Some may remember that at the last congress we discussed whistle-blower protection. In Art 16 of the basic regulation whistleblowing is specifically referred to. That of course is the easy part. Having it transformed in real protection for reporters is far more difficult. Too many authorities believe that their responsibilities are limited to only protecting the data and not the individual. WRONG.

We have again and again emphasised that with a reported occurrence in hand the particular airlines or maintenance organisation usually has not much trouble finding the most likely reporter of the particular event since each of us signs for all the work we do with name and number. We are often accused by EASA and other authorities that we do not show proof of what we bring to them. Again I have to emphasise that it is AEI’s strong belief that a number of authorities cannot be trusted with such information.

We are aware of several colleagues who were victims to such NAA carelessness and who ultimately lost their jobs and future in aviation. We will continue to fight for proper implementation of the regulation.

Congress 2011

The Istanbul congress preparations are racing ahead and some information is already available on the AEI website. Dates are 5-9 October 2011. Our host TALTA the Turkish engineers association will do their utmost to prepare a memorable congress where we will have time for proper discussion since congress has been extended 1 day. We need to discuss issues until we have the feeling all is said and a proper follow up is agreed. As Secretary General of AEI I look forward to meeting many old friends and am looking forward meeting new.

Fred Bruggeman
AEI Secretary General