15.07.2019

Subject: Non-compliant release to service

Dear Ms Bulc

In 2015 AEI told EASA that aircraft were being routinely released to service in Germany without undergoing the requisite inspections, in breach of EASA’s rules. Safe operations were thereby jeopardised. An EASA audit of the Luftfahrt Bundesamt (LBA), based upon the information we provided, confirmed those safety concerns. The audit stated four years ago that “the maximum timeframe for achieving full agreement on all findings is 16 weeks from the date of receipt of the draft Report”. The audit report has now been closed by EASA in the full knowledge that the Certificate of Release to Service (CRS) finding has not been addressed and therefore that the audit cannot be closed.

The LBA remains non-compliant and continues to allow uninspected aircraft to operate throughout Europe. We have told you this. You told us our members had to come forward and give evidence, knowing that under German law this would expose them to loss of their livelihoods and liability for damages to their employers. You signally failed to offer any protection from this.

You recently tweeted “In #aviation, safety is our top priority” and attached a self-congratulatory video https://t.co/xhqMW3NYAg

The events of the past four years are demonstrable evidence that the current system of airline and MRO oversight has failed European citizens, and that safety is far from your top priority. You have written that the EU and EASA are confident that CRS is well understood throughout Europe. You and EASA know that is false. Major differences between national authorities as to what verification is required prior to issuing a CRS continue to exist throughout Europe. The LBA has even gone on record as refusing to implement the existing EASA procedures when it stated in an email to an operator:

“Subject: Implementation of the EASA policy on Certificates of Release to Service for aircraft maintenance”

“I would like to inform you that following an internal LBA discussion on the subject of "Implementation of EASA policies", "It has been decided that EASA policies can only be implemented by the LBA if they are at least included in the AMC material to Part-145".

Until something has been done about this long running failure of you, EASA and the LBA, your claim that aviation safety is your top priority is risible, false and an embarrassment to the EU.
We respectfully request that you and your department do the job you are tasked to do and protect European citizens, in the first instance by insisting that the German national aviation regulator (LBA) requires that the organisations under its oversight abide by European regulations.

Please let us know what you are now prepared to do to safeguard the CRS process in Europe generally and Germany in particular.

Ola Blomqvist
AEI President