

You can save this page as HTML and then open it in Microsoft Word for further editing.

Title	Fuel planning and management — Sub-NPA (A) 'Aeroplanes — Annex I (Definitions), Part-ARO, Part-CAT'
NPA Number	NPA 2016-06(A)

UK CAA (European.Affairs@caa.co.uk) has placed **13** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
100	2. Explanatory Note	6	<p>Page No: 6</p> <p>Paragraph No: Explanatory note</p> <p>Comment: The UK CAA appreciates the considerable amount of effort that has obviously gone into providing such a comprehensive explanatory note. This helped considerably in understanding the rational and principles intended with the proposed changes.</p>	
103	3. Proposed amendments — 3.1. Draft Regulation (draft EASA Opinion) — Definitions	31 - 32	<p>Page No: 31</p> <p>Paragraph No: 3.1 / 1. Definitions - Safe Landing</p> <p>Comment: It is recommended that the definition of 'safe landing' is amended as shown to improve readability and consistency with similar examples in NPA 2016-06 Part (B) and (C).</p> <p>Justification: Clarity</p> <p>Proposed Text:</p> <p>'safe landing' means a safe landing in the context of the fuel policy/fuel scheme, a landing at an adequate aerodrome or operating site or, for helicopters, at a precautionary landing site, with no less than the final reserve fuel and in compliance with the applicable operational procedures and aerodrome operating minima.</p>	
104	3. Proposed amendments — 3.2. Draft AMC/GM (draft EASA Decision) — Definitions	32	<p>Page No: 32</p> <p>Paragraph No: 3.2 / 1, GM13 NCO.OP.125(b)</p> <p>Comment: Header should refer to Annex 1 not Part-NCO.</p> <p>Justification: Suspected editorial error.</p>	
105	3. Proposed amendments — 3.6. Draft Regulation (draft EASA Opinion) — Part-CAT	37 - 43	<p>Page No: 39</p> <p>Paragraph No: 3.6 / 6, CAT.OP.MPA182</p> <p>Comment: It is recommended that the section header is amended as shown to indicate the relevance to Performance Class B aeroplanes.</p> <p>Justification: Clarity</p>	

Proposed Text:

CAT.OP.MPA.182 Fuel schemes - fuel planning and in-flight replanning policy *performance class B aeroplanes*
~~FUEL SCHEME WITH VARIATIONS — PERFORMANCE CLASS-B AEROPLANES~~

107 3. Proposed amendments — 37 - 43
 3.6. Draft Regulation (draft EASA Opinion) — Part-CAT

Page No: 39

Paragraph No: 3.6 / 6, CAT.OP.MPA182 (a)

Comment: The proposed text does not align with CAT.OP.MPA.181 and it is recommended that the amendment proposed below is used. In particular the use of 'reserve fuel' is not appropriate and 'additional', 'extra' and 'discretionary' fuel are not mentioned or at variance. It is further recommended that suitable AMC/GM is provided for this section.

Justification: Consistency of terms

Proposed Text: Amend to read as follows:

CAT.OP.MPA.182 Fuel schemes — fuel planning and in-flight replanning policy *performance class B aeroplanes*

(a) Notwithstanding CAT.OP.MPA.181(b) to (d), for operations of Performance Class B aeroplanes, the operator shall ensure that the preflight calculation of usable fuel required for a flight includes:

(i) taxi fuel, ~~if significant,~~ ***which shall not be less than the amount expected to be used prior to take-off;***

(ii) trip fuel;

~~(iii) reserve fuel, consisting of:~~

~~(A) (iii)~~ contingency fuel that is not less than 5 % of the planned trip fuel or, in the event of in-flight replanning, 5 % of the trip fuel for the remainder of the flight; and

(iv) ***Destination*** alternate fuel, ~~to reach the destination alternate aerodrome via the destination~~ alternate aerodrome if a destination alternate aerodrome is required;

~~(B) (v)~~ final reserve fuel ~~to fly for an additional period of 45 min for reciprocating engines or 30 min for turbine engines;~~ ***which shall not be less than:***

(A) for aeroplanes with reciprocating engines, the fuel to fly for 45 minutes; or

(B) for turbine-engined aeroplanes, the fuel to fly for 30 minutes at holding speed at 1 500 ft (450 m) above the aerodrome elevation in standard conditions, calculated according to the estimated mass on arrival at the destination alternate aerodrome or the destination aerodrome when no destination alternate aerodrome is required;

(vi) ***additional fuel, if required by the type of operation;***

			<p>(v) (vii) extra fuel, if specified by the commander. to take into account anticipated delays or specific operational constraints; and</p> <p>(viii) discretionary fuel, if required by the commander.</p>	
108	3. Proposed amendments — 3.6. Draft Regulation (draft EASA Opinion) — Part-CAT	37 - 43	<p>Page No: 41</p> <p>Paragraph No: 3.6 / 8,. CAT.OP.MPA.185 (c)</p> <p>Comment: The proposed text correctly reflects that provided in ICAO Annex 6. However, due to the new proposed definition of 'safe landing,' which means you shall land with 'no less than final reserves, the statement no longer makes sense. Recommended amended text proposed below.</p> <p>Justification: Clarity of intent and purpose</p> <p>Proposed Text:</p> <p>(c) The commander shall declare a situation of fuel emergency by broadcasting MAYDAY MAYDAY MAYDAY FUEL when the fuel predicted to be available upon landing at the nearest aerodrome where a safe landing can be made is less than the planned final reserve fuel.</p>	
110	3. Proposed amendments — 3.7. Draft AMC/GM (draft EASA Decision) — Part-CAT	44 - 64	<p>Page No: 50</p> <p>Paragraph No: 3.7 / 8, New AMC2 CAT.OP.MPA.181 (b)</p> <p>Comment: Last line of the paragraph, amend "bellow" to 'below'.</p> <p>Justification: Editorial error</p>	
111	3. Proposed amendments — 3.7. Draft AMC/GM (draft EASA Decision) — Part-CAT	44 - 64	<p>Page No: 51</p> <p>Paragraph No: 3.7 / 8, New AMC2 CAT.OP.MPA181 (d), (1), (vii) & (2) (viii)</p> <p>Comment: It is recommended that the text regarding 'extra' and 'discretionary' fuel is amended as shown to remain consistent with other sections.</p> <p>Justification: Consistency and alignment</p> <p>Proposed Text:</p> <p>(vii) extra fuel if required by the commander to take into account anticipated delays or specific operational constraints; and</p> <p>(viii) discretionary fuel, if required by the commander; or</p>	
112	3. Proposed amendments — 3.7. Draft AMC/GM (draft EASA Decision) — Part-CAT	44 - 64	<p>Page No: 52</p> <p>Paragraph No: 3.7 / 10,.New GM3 CAT.OP.MPA181</p> <p>Comment: Section header not consistent with proposed GM1</p>	

			<p>Justification: Suspected editorial error</p> <p>Proposed Text: GM1 CAT.OP.MPA.181</p>	
113	3. Proposed amendments — 3.7. Draft AMC/GM (draft EASA Decision) — Part-CAT	44 - 64	<p>Page No: 53</p> <p>Paragraph No: 3.7 / 13, GM1 CAT.OP.MPA.181 (b)(2)(iii)</p> <p>Comment: The meaning of the text as presented in the first sentence is not clear and should be reviewed to ensure the intent is fully met.</p> <p>Justification: Clarity of wording</p>	
114	3. Proposed amendments — 3.7. Draft AMC/GM (draft EASA Decision) — Part-CAT	44 - 64	<p>Page No: 55</p> <p>Paragraph No: 3.7 / 20, GM1 CAT.OP.181 (c)(3)</p> <p>Comment: Section header not consistent with proposed GM2</p> <p>Justification: Suspected editorial error</p> <p>Proposed Text: GM2 CAT.OP.MPA.181 (c) (3)</p>	
115	3. Proposed amendments — 3.7. Draft AMC/GM (draft EASA Decision) — Part-CAT	44 - 64	<p>Page No: 56</p> <p>Paragraph No: 3.7 / 25, GM1 CAT.OP.MPA.181(d)</p> <p>Comment: In the 3rd line of the paragraph the word 'not' appears to be missing between 'could' and 'be completed' which changes the intent of the sentence.</p> <p>Justification: Suspected editorial error</p> <p>Proposed Text: In flight re-planning.....when the flight <i>could not be completed ...</i></p>	
116	4. RIA — 4.6. Comparison and conclusion — 4.6.1. Comparison of options	89	<p>Page No: 89</p> <p>Paragraph No: 4.6.1, Comparison of options</p> <p>Comment: The UK CAA supports the selection of option 2 but considers that the impact on NAAs to provide appropriate training and resourcing could be quite significant and should not be underestimated.</p> <p>Justification: Assessment of impact on oversight activities.</p>	