



**Light Aircraft Manufacturers Association of Canada**

880 St-Fereol, Les Cedres, Qc.  
J7T 1N3, Canada.  
Tel: (450) 452-4772

19 October, 2004.

On September 29<sup>th</sup> Transport Canada invited Marlene Gill from LAMAC to join with other organizations within the aviation industry to examine the current Recreational Aviation Policies, and determine what if any issues needed re-addressing. The agenda was left open so that attendees could explore and brainstorm new initiatives for Recreational Aviation Canada into the future. Following is a list of attendees:

**Denis Browne**, EAA, Canada Council  
**Herb Cunningham**, COPA, EAA.  
**Adam Hunt**, COPA  
**Marlene Gill**, LAMAC, CLASS Inc.  
**John Glavind**, Transport Canada  
**Kathy Lubitz**, UPAC  
**Jim McCollum**, Soaring Association of Canada  
**André Nadeau**, Hanglider and Paraglider Association of Canada  
**Chris Patton**, Capital Air Sports  
**Cathy Tinney**, Canadian Trike Pilots Association  
**Paul Sharpe**, RAA  
**Maurice Simoneau**, Transport Canada  
**Ted Slack**, EAA  
**Arlo Speer**, Transport Canada  
**Gary Wolfe**, RAA

Many items were placed on the table. The issues raised came under the following broad categories.

**US and Canada Pilot Documents**

- Similarity of privileges for similar documents
- Ease of validation of foreign pilot documents for use in Canada
- Permitting foreign pilots to fly Canadian aircraft using the foreign licence.

**Driver Licence Medical as an alternative to the Category 4 “Self Declaration” Medical Certificate**

**Allow holders of PP-UL to fly any aircraft that met the definition of ultra-light (1232 lbs AULA included) regardless of certificate of airworthiness issued, while freezing the status quo of the present training requirements for the PP-UL.**

**The USA Light Sport Plane:**

- Harmonization with the USA
- Evaluation of whether to upgrade the AULA to the LSA standards or
- Leave the AULA within the ultra-light realm, and create a new Canadian Sport Category that harmonized with the USA LSA.

**Owners and manufacturers lack of communication and knowledge regarding the standards and procedures for compliance for the AULA.**

**AULA manufacturers level of compliance with the Design Standards.**

**General RecAv community attitude**

- Poor attitude towards regulations
- Low level of enforcement of regulatory requirements
- Reluctance within the RecAv community to report significant safety infractions

**Transport Canada issues:**

- Regional Inconsistencies within the Transport Canada's administrative processes.
- Over regulation of aviation by the CARs, while evidence supported that aviation safety was already at an acceptable level
- Lack of Transport Canada's defence of federal jurisdiction over aviation-related matters.

**High cost of insurance, and difficulties in obtaining hull or public liability for flight training.**

**Foreign Aircraft:**

- Streamline process for importation of gliders from Eastern Block Countries
- Streamline process for registration of foreign aircraft that do not have a type certificate in country of origin.

**Category for motorized hang gliders.**

**Annual NavCanada fees for non users of the service.**

**Failure of the National Airports Policy and the crumbling of airport infrastructure.**

While all of the above were briefly identified and discussed, the USA Light Sport Aircraft (LSA) was the dominant topic. The "Harmonizing the AULA with the US Light Sport Aircraft" was chosen for a risk assessment exercise. The following table is from Arlo Speer's notes.

The First Issue Assessed:  
*Harmonising AULA with the US Light Sport aircraft*

What are possible risks?	Probability H / M / L	Seriousness H / M / L	Exposure H / M / L
1. More complexity re maintenance	H	L	L
2. Consensus docs open every few years causing changes with little control	M	L	L
3. Some existing Canadian aircraft may not qualify	M	L	L
4. Canadian Manufacturers may be producing products (AULA) not eligible as LSA	H	H	M
5. LSA program may not work	unknown		
6. Student training requirements may become more expensive (aircraft costs)	H	M	M
7. Loss of dedicated UL training schools	L	L	L
8. US manufacturers may not be producing LSA compliant products	L	L	L
9. Additional costs of setting up a process for evaluation of manufacturing (QA requirements)	H	L	L
10. Loss of competitive position for Canadian production	L	L	L
11. Nobody bothers with the license or permits (killed by complication)	L	H	M
12. Student training requirements may become more onerous (additional training requirements)	M	M	L

*Highlighted in yellow are two areas where risk elements where probability, seriousness and exposure were all more than “low”*

Items 4. and 6. were considered serious risks to the present UL community. If the AULA ceased to exist, there would be no options open for the present manufacturers of existing AULAs but to downgrade their machines to basic ultra-lights. While the success of the LSA was listed as an unknown, it was identified nevertheless as a threat since if it did not work, we would have aligned ourselves with a failure and lost a current successful Canadian category in the AULA. The UL Pilots who presently have the privilege of flying the AULA would either lose this privilege or be forced to undergo additional flight training.

Risk mitigation strategies for these items were identified as follows:

- Develop a “Canadian Sport Aeroplane” as an **additional** category, not a replacement for the existing advanced ultra-light aeroplane. This will protect those manufacturers who wish to continue producing Advanced Ultra-light

aeroplanes, but have no interest in the more rigorous requirements of the Light Sport Airplane rules.

- Grandfather in current products that would comply with the Sport Plane category.
- Leave the basic ultra-lights (BULA) and Advanced Ultra-light (AULA) frozen where they are with no change to current status for pilot training.
- Permit the Canadian Sport Aeroplane to be used for flight training towards the Recreational Pilot Permit and higher.

Pilot training issues were also explored as ways of mitigating the risks identified.

There was a consensus that a future meeting in the near future which focused primarily on the LSA initiative should be arranged. However, it has been agreed that the next RecAv meeting which will be held on 7<sup>th</sup> and 8<sup>th</sup> December will address all of the issues and those identified for further work would be divided up into sub-committees.

It was also suggested that other members from other groups (AME associations and ATAC) should be present.

### **LAMAC's POSITION**

It was expected that the LSA design standards would be based on the DS 10141 for the Canadian Advanced Ultra-light Aeroplane (AULA). The maximum gross weight of the AULA is 770 lbs for a single place aeroplane and 1232 lbs for a two place aeroplane, with a maximum stall speed of 45 MPH. While the standards are very similar, the LSA final rule approved a maximum gross of 1320 lbs for land operations, and 1430 lbs for water operations and a stall speed of 51 MPH. In addition, there is a requirement that foreign manufactured LSA be eligible for a certificate of airworthiness or flight permit in its country of manufacture. The requirements for a Canadian manufactured aircraft to be sold in the USA under the Light Sport Plane Rules read as follows:

“For aircraft manufactured outside of the United States to be eligible for a special airworthiness certificate in the light-sport category, an applicant must provide the FAA with

- (a) The aircraft's operating instructions
- (b) The aircraft's maintenance and inspection procedures
- (c) The manufacturer's statement of compliance
- (d) The aircraft's flight training supplement.
- (e) Evidence that the aircraft was manufactured in a country with which the United States has a Bilateral Airworthiness Agreement concerning airplanes, or Bilateral Aviation Safety Agreement with associated Implementation Procedures for Airworthiness concerning airplanes, or an equivalent airworthiness agreement
- (f) Evidence that the aircraft is eligible for an airworthiness certificate, flight authorization or other similar certification in its country of manufacture.

Lastly, the aircraft will be inspected by the FAA .

Since the AULA in Canada operates with no flight authorization or airworthiness certificate, it is automatically excluded from being imported into the USA and certified under the LSA rules. Canada therefore has no choice but to proceed immediately to create a Canadian equivalent category aircraft which will comply with the US LSA standards. This position was shared by the majority of the attendees present at the RecAv meeting on 29 September 2004.

### **The drafting of the Standards.**

While the final rule for the LSA was passed on September 1, 2004, the consensus standards applicable to the airplane and licence are still being drafted by ASTM International.

LAMAC is a contributing member of the development of these standards for the USA LSA. By monitoring the standards as they are being drafted, we will be very well positioned to create the Canadian Category that will be eligible for sale in the USA through our countries' bilateral agreements.

The three main subcommittees of the standards for the LSA which are of particular interest to Canadian manufacturers who wish to produce aircraft which are LSA compliant are.

1. **F2245-04 Standard Specifications for Design & Performance of Light Sport Airplane;**
2. **F-2295-03 Standard Practice for Continued Operational Safety Monitoring of LSA and**
3. **F-2279-03 Standard Practice for Quality Assurance in the Manufacture of LSA.**

The new Canadian category aircraft will use these standards as a minimum.

On 7<sup>th</sup> December 2004 LAMAC will be making a presentation to Transport Canada with the proposal to start immediately to draft these standards.

We are inviting all members and potential members of LAMAC to send us your opinions, questions and concerns so that they may be voiced in Ottawa at the upcoming meeting with Transport Canada. While these new standards would be based on the USA LSA standards, they should include input from all Canadian manufacturers, and as such will reflect the unique needs of Canadian aviation community.

Marlene Gill.