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Esitys ultrakevytlentäjän lääketieteellisten kelpoisuusvaatimusten muuttamisesta

Suomen Ilmailuliitto esittää B1-luokan ultrakevytlentäjän lupakirjaoikeuksien käyttöön vaaditun lääketieteellisen kelpoisuustodistuksen korvaamista terveydentilavaatimuksella, joka vastaa ajoneuvon kuljettajan (B-ajokortti) terveydentilavaatimusta.

Ilmailuliitto esittää, että ilmailulääkärille annettaisiin enemmän oikeuksia myöntää B2-luokan medikaali harkinnanvaraisten poikkeuksien nojalla. Lähtökohtana voisi olla LAPL-medikaalivaatimukset, joihin tapauskohtaisesti harkiten sallittaisiin poikkeuksia.

Perustelut

Ilmailuharrastajien tasapuolinen kohtelu ja turvallisuustason säilyminen

Liitteessä 1. näkyy useamman eri Euroopan maan käytännöt ultrakevytlentäjien medikaalivaatimuksissa. Monessa maassa vaatimukset ovat LAPL-medikaalia kevyemmät. Esim. Liettuassa on lennetty ajokortin haltijalta vaadittuun terveydentilaan rinnastettavalla medikaalilla yli 25 vuotta ilman ongelmia. Listasta puuttuu USA:n LSA-luokka, joka vastaa Suomessa lentäviä B2-luokan ultrakeveitä koneita. USA:n LSA-luokassa on myös ns. ajokorttiterveysvaatimus käytössä.

B1-luokan ultrakevyet lentokoneet saavat olla maksimissaan kaksipaikkaisia ja painaa saman verran kuin moottoroidut liitimet, joten ne ovat niiltä osin keskenään vertailukelpoisia. Koska moottoroidun liitimen lentämiseen ei vaadita lainkaan lääketieteellistä kelpoisuustodistusta, on esimerkiksi 495 kg painavaa, Rotax-moottorilla varustettua, kaksipaikkaista moottoroitua liidintä mahdollista lentää ilman erityisiä terveysvaatimuksia. Jos B1-luokan ultrakevytlentäjältä vaaditaan jatkossa ns. ajokorttiterveys, pysyy vaatimus edelleen tiukempana kuin olemassa oleva käytäntö moottoroitujen liitimien lentäjien kohdalla.

Ilmailuliiton Experimental- ja ultrakevyttoimikunta (EUT) jatkaa mielellään Traficomien edustajien kanssa asian eteenpäin viemistä.

Suomen Ilmailuliitto – Finlands Flygförbund ry

Timo Latikka
toiminnanjohtaja



Litteet

What are the (minimum) requirements for flying microlights in your country:								
Country	License	Theory	Practice	Medical	Initial airworthiness	Maintenance	Operational rules	Other comments
Belgium	Specific National ULM license (only DPM and 3-axis) Validity 2 years, 50 hours of flight needed, if not : check with examiner	Exam with our CAA, only on legislation Exam in flight school : 6 modules (aerodynamics, aerology, technics of flying, weather, safety)	no minimum hours, instructor decides if student is ready Examiner decides after check in flight and on theoretical modules 30 hours minimum for flight with passengers	class 4	Type certificate can be obtained. Requirements similar to Germany. Our federation helps applicants to comply	only owners responsibility to comply manufacturer recommended maintenance manual. No inspections from authority.		
Czech Republic	depends on what kind of license - we have special license for all kinds of SFE (Sports Flying Equipment). Following are the numbers for aerodynamically controlled microlights	UL-3 syllaby - total 45 hours but after 21 hours the practical training can start	minimum 20 hours and 112 flights, but the average is around 37 hours - it is competence based	ICAO Level II	Czech Regulation UL2-2019	no special regulation, I tis assured by our airworthiness system - ofr compny build planes technical check by the LAA CR Technical Inspector every two years, amateur build every year	no noise certificate required, rescue system is not mandatory	Most of our main rules are translated into English - I can send it
Denmark	MLA License	National MLA theory - equal to PPL theory	Minimum 20 hours, including 5 hours solo. 25 hours of solo flying before flying with passengers.	LAPL	MLA planes flying in Germany, Czech Rep., Sweden and United Kingdom can be approved to fly in Denmark.	Done by owner confirm Handbook. Every two years or every 200 hours inspection by DULFU's equipment manager and new flight permit.	Noise Certificate (not more than 60 dB) according to the German Lärmschutzforderungen für Ultraleichtflugzeugen	
Finland	National Microlight license (UPL) according to national regulation PEL M2-70 (3-axis aircraft only. Flexwings have a different licensing system)	10 different subjects, xx hours. In addition a restricted national radio telephone operators certificate is required.	min. 25 flight hours, of which min. 15h dual and min. 5h solo. At least 5 hours of cross country flying including at least one solo flight of minimum 150 km, with a full stop landing on a different aerodrome than the departure aerodrome, shall be included in the practical training. (If the applicant has a LAPLIA) or a PPL with valid SEP rating, the minimum is 2 hours of dual instruction)	EASA-MED 1 or 2 or LAPL-MED.	When a new ULAC type is introduced, it undergoes type inspection to gain type certification. The subsequent aircraft of the approved type receive airworthiness as long as they meet the requirements of the initial inspection. In practice aircraft certified in CZ, DE, UK, SE only require minor modification (eg. seat belt latch mechanism) to meet airworthiness requirements.	Different competence levels give specific maintenance privileges. a) Owner of ULAC may sign off 50h, 100h etc. service b) Owner of ULAC with special training may sign off annual inspection and repairs according to the focus area of the special training c) Qualified mechanic with suitable competences is required for more advanced service and repairs to eg. primary structures		The license is initially valid for solo flying. After having received the license and flown an additional 10 hours solo and performed a check flight for the passenger carrying rating, one passenger may be carried. A refresher training flight shall be performed every 2 years to keep the PIC privileges. Pilots with no higher licence are subject to a minimum VFR cloud ceiling of 1000 feet or more.
France	Specific microlight licence registered by CAA, with extension for each categories of microlights: Paramotor , trikes, multiaxes, gyrocopters, motorised baloon, helicoptere. Permanent validity for the pilot licence. Additional extension to flight with a passenger. Additional extension to use radio. Additional extension for instructor qualification (for each categorie) . (3 years validy instructor qualification need a mandatory training	commun formal exam (MCQ with 75% success) available for all categories; and additional specific exam for each categories by the instructor (on same time that practical exam) : Programs contains included in regulation	no minimum hours requirement, depending of the categorie and the pilot level. The instructor is fully responsible for the delivery of the practice exam when consdering that the pilot student is ready.	no medical requirement by aeronautical regulation. General "self health questionnaire" used for all sport federation)	General French Regulation NOR: EQUA9801294A / 1998 September 23th modified on 2019 June 24th (possibility by the owner to use or not opt-out extension 450kg to 500kg (+25kg with Recovery canopy)	no special regulation, owner responsibility , based on instruction fixed by the constructor (user and maintenance manuel) . No inspection mandatory.	Only VFR day flight; Rescue canopy system; owner responsibility to respect check periodicity; no noise certificate, but noise imitation specified by regulation for initial type submission.	free acces to any microlight airfield and airport, on pilot's responsibility (and competency). For private airfield, with the prior permission of the airfield manager.
Germany		60 h	Min. 30 h	LAPL	Musterzulassung	Guideline from manufacturer	Except autogyro: ballistic rescue system compulsory. Only vfr day. No acro, no autopilot	
Ireland	National Microlight Pilot License issued by CAA. Categories of 3 Axis / Flex Wing Powered Parachute / With Land / Sea ratings. Flex Wing and PP and Sea ratings not possible at present. License must be re-validated every 2 years.	EASA PPL , 100 Hours , 4 Exams. Nine Modules. Sitting Every two months at CAA. English Language Proficiency Test	40 Hours + 80 KN cross country. / Hopefully will change to LAPL 30 PPL Standard Examination with CAA appointed Examiner	EASA PPL / LAPL	Aircraft model type must be accepted by CAA as approved type This is based on country of manufacture, design standard BCARS/DULV/Other European, Other factors, Safety report, Need for type v Existing types Flight test conducted on aircraft prior to initial permit issued on behalf of CAA.	Owner maintained subject to annual inspection by CAA appointed inspector. Inspection role delegated to NMAI role similar to EASA CAMO	VFR day, No aerobatics, Restrictions on flight/ Airspace.	Average time to complete license 18 months



Lithuania		75 for 3-axis	25 for 3-axis	car driver or higher. No issues with 1000+ pilots over 25 years (currently - around 700 active pilots).	manufacturer declaration/homebuilt or factory MLA)	at owners discretion. Yearly checks by federation nominated, caa approved inspector.	no noise certificate requires for non-commercial. PLB should be on board.	600 kg is undermining real MLAs. CAA is waiting for EASA decisions on light-GA. EMF recommendation would help.
Netherlands	RPL MLA (Recreational Pilot License MLA)	PPL	30 hrs flying of which 10 hrs solo	LAPL	MLA planes flying in Germany, Czech Rep. and United Kingdom are allowed to fly in the Netherlands	done by owner confirm Handbook, once a year inspection by person with Part 66	Noise Certificate (not more than 60 dB) according to the German Lärmschutzforderungen für Ultraleichtflugzeugen	
Norway	Microlight pilots license (national requirements, BSL D 4-8 and safety system by Norwegian Air Sports Federation).	National requirements	Practice minimum og 30 hrs flying (25 hrs for weightshift).	National requirements, and/or medical LAPL or higher..	Initial airworthiness: MLA planes flying in Germany, Czech Rep. and United Kingdom are within the frame to get a permit to fly in Norway.	Maintenance done by owner in accordance with the manufacturers serviceprogram, and in accordance with national requirements, inspection once a year by a separately inspection by a technician.		
Poland	UAP(L)	54 h	28 h	Class II	By registered organisation (can be even regular person, not company), confirmed by CAA which is still authority	Partly by user partly by mechanic for this category	Nothing special, it is legal to flight by night with instruments	
Slovakia	Airplanes, Gyro, Helicopters - licence FSE (flight sports equipments)	60 hours	25 hours 114 Take off - for basic licencie (not valid for flying inside controlled airspace)	LAPL	We have SFUL regulation 2/2010. Build under technical inspector check.	every 12 monts technical check - technical inspector	Rescue system and noise certificate is not mandatory.	
Spain	Specific National ULM license	OACI PPL syllabus adopted	15 flight time minimum but flying schools prescribe the minimum hours for each student.	LAPL class	Two ways: 1.- type certification under requirements very similar to German, 2.- amateur construction. Very easy and relaxed regulation	When ULM type certificated: owners responsibility to comply manufacturer recommended maintenance manual. No inspections from authority. Amateur construction: owner responsibility. Inspections every 2 years.	Not allowed to fly above 1000 ft AGL. The new 600kg regulation adds a text excluding this rule. Not allowed to enter in controlled airspace	
Sweden	National Microlight license (UPL according to national regulation PEL M2-70 (3-axis aircraft only, flexwings have a different licensing system)	PPL syllabus with slight modification, examination under club supervision. No requirement for a certain amount of hours.	minimum 20 flight hours, after passing examination pilot must fly 10 hours solo before taking passengers. A revision of this requirement is underway. Real life hours flown before examination is mostly 30+	"LAPL" medical	Type specification approved by CAA, "made" by national aero club. Since approx one year no national specification is made, instead German, Czech or other specification serve as base and is only translated. This has provided a funny example where suddenly a "local" German version of a Czech aircraft was granted permission to fly, without ever having been imported, weighed or noise measured. I kind of like that. :)	Owner maintenance, inspection by CAA-approved technician at least every third year.	Operational rules (besides normal flight checks, but eg Rescue System, noise certificate etc.). Certificate of environmental quality required, noise not more than 70db. It is possible to judge sound level based on similar aircraft (low wing, same engine, same prop f.x) and thus not have to make a real sound measurement flight.	Revision of rules underway. Gyroplanes follow the same regulations but are not microlights. Helicopters hopefully will be introduced, and Trikes "deregulated".
Switzerland	EASA LAPL (A new national license is on the way but requesting first an LAPL(A) or LAPL(H) !!! and then a training course..)	EASA PPL 100 hrs with communication EASA Radiotelephony and LPC are necessary!!!!	LAPL or PPL and UL familiarization	LAPL or better (for us SMF absolutely unnecessary)	LTF UL or Bcar-only 3 axis, Gyros or electrical trikes, electrical paragliders	like EASA part M 66 or part 145 technical file necessary (we are trying to change that)	- All TIO LDG must take place at an aerodrome - Transponder check every two years in a workshop !!! - Noise certification requested 65db - 68 db (600 kg) acc ICAO maximum for 600 kg is 70. - EASA basic regulation 2018/1139 only in force since 1st of sept 2019 - BRS requested acc to LTF UL	
UK	National private Pilots licence with a microlight rating.	5 written exams. Candidates can learn by self study if they wish - so no mandatory attendance at theory classes. Instructors can apply for Examiner ratings and keep the papers and administer the exams.	Two levels of license: With operational limitations (no passengers and no flight more than 8nm from takeoff point) - min 15 hours. Without operational limitations - min 25hours. Must pass flight test with Examiner. In reality the average time to learn to required standard takes much longer - add one hour for every year older than 25 is a good guide.. Cross credits reduce required minima for hanglider, glider etc: experience. Pilots with general aviation licenses can fly microlights after satisfactorily completing differences training with a microlight instructor.	self declaration online system	None required for single seaters. Fit two seaters - Opnency certification to an approved design code (BCAR Section 5, CS-VLA, CS-LSA). For ready to fly two seat microlight aircraft the manufacturer must gain manufacturing approval to BCAR A8-1. And flight test approval to BCAR A8-9 these are expensive and detailed.	No formal maintenance training / license required - so Owner can do maintenance, or contract it out to anyone they deem to be a 'competent person'. Annual inspection of two seaters by BMAA / LAA inspector. Repairs to two seaters must be overseen by an inspector and other than simple repair by replacement, repairs must approved by a CAA approved organisation (manufacturer / BMAA / LAA) Airframe and engine log books must be kept and all hours and maintenance, checks etc recorded. Engines can be run 'on condition' beyond manufacturers recommended TBO. (to be consistent with microlight ethos of low energy with good engine out gliding capability, and use of uncertified engines) Airframe component life as dictated by manufacturer must be followed.	Registration marks required. Noise testing / certificates recently discontinued. Rescue systems must be maintained in accordance with manufacturers instructions. Aircraft must have a check flight and report submitted with annual inspection. Owner can do it. Radio installation license required (government tax)	Aircraft that weigh less than 70kg with full fuel, and stalling speed less than 20knots are classified as Wheeled Self Launching Hangliders. No airworthiness or registration marks required. No pilots license required. This category is currently the fastest growing category and outselling all other microlight types..