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<b>Safety Recommendation Status:</b>	Not accepted, closed

**Safety Recommendation:**

The Ministry of Transport of the Czech Republic should ensure through appropriate means that owners/operators of NG4 aircraft, globally, are advised of the revised weight and balance documentation, including any changes to moment arms, to be used for aircraft weight and balance calculation.

**Response:**

In a letter dated 18 August 2022 the Ministry of Transport of the Czech Republic provided the following response to Safety Recommendations IRLD2022010:

‘According to the national authorities of the Czech Republic the uniform determination of the weight and balance documentation of amateur-built aircraft (hereinafter referred to as "ABA") is not feasible. Any individual structure (included ABA assembled from a kit delivered by a Homebuilt Airplane type certificated holder) must have own weight and balance documentation in accordance with national regulations. This should be supervised by the competent authority of the state of registry, respectively state of record.

According to the national regulations of the Czech Republic, the data for assessing weight and balance of the concerned ABA must always be determined according to the actual weight distribution of the customized aircraft i.e., based on the protocol of weighing of the individual ABA and calculation of the centre of gravity carried out on its basis. This means that the moment arms, according to the national regulations and procedures used in the Czech Republic, are the result of the Weighing of each individual specific ABA, and are assessed and determined only when a Specific ABA is put into operation i.e., at the moment of its entry into the ABA register maintained by the Light Aircraft Association of the Czech Republic (hereinafter referred to as “LAA CR”), not by calculation according to the approved type documentation.

This must be Verified within the process of approving an individual ABA for operation by the relevant authority of the specific state in whose territory the ABA in question is registered. However, the Ministry of Transport of the Czech Republic is not competent in any way to influence the activities of the national authorities of other states on whose territory the ABA is operated or registered’.

#### AAIU Reply:

In a letter dated 7 September 2022 the AAIU reverted to the Ministry of Transport of the Czech Republic with the following:

The AAIU acknowledges the response to Safety Recommendation IRLD2022010 by the Ministry of Transport of the Czech Republic.

However, the Safety Recommendation refers to the Weight and Balance documentation for an aircraft, and not the aircraft itself. In this case the NG4 aircraft was factory-built. It is understood that owner/operators of these aircraft, whether factory-built or amateur-built, take the technical documentation available from a manufacturer (especially details such as moment arm data for items such as fuel tank location, wing stowage locker location, seat location, rear stowage location) as true and accurate, and contained in a trusted document. The AAIU believes that this is an important safety issue and that the Ministry of Transport of the Czech Republic is best placed to advise owners/operators of NG4 aircraft, through appropriate means (such as through communication with other State National Aviation Authorities where these aircraft may be operating), regarding revised weight and balance documentation, including any changes to moment arms, to be used for aircraft weight and balance calculation. The AAIU would suggest that the Ministry of Transport of the Czech Republic reviews its response to Safety Recommendation IRLD2022010.

#### Response:

In an email dated 22 November 2022, the AAIU received the following from the Safety Investigation Authority of the Czech Republic (UZPLN):

[...] received a brief statement of the Director of the Civil Aviation Department of the Ministry of Transport regarding that part of your question if they wish to make another response to the two SRs, which concerned and was addressed to the Ministry of Transport. I received the original statement in the Czech language and I am sending you its translation with the approval of the director of the civil aviation department:

‘The Ministry of Transport – Civil Aviation Department will no longer respond in this matter. AAIU can thus publish both our original response and their response.’

#### **AAIU Comment:**

The AAIU considers this Safety Recommendation as 'Not Accepted, Closed'.