

COMMENT RESPONSE DOCUMENT

EASA PAD No.: 26-095

Published on 20 August 2026 and officially closed for comments on 17 September 2026

Commenter 1: Aeroklub Rzeszowski – Marcin Suzański – 23/08/2026

Comment # 1

In connection with the publication of EASA PAD 26-095 regarding the SZD-54-2 glider, we request that the ad hoc inspection interval be changed to 100 hours (instead of 200 FC).

The issue of the torsion tube air brakes in Poland-made gliders has been known for over 40 years (the SZD-50-3 glider is a prime example), for which the corresponding AD interval is 100 hours/12 months.

EASA response:

EASA does not agree with this proposal.

The use and number of airbrake control cycles at a 'high load' is clearly more related to the number of flights (flight cycles) than to flight time.

This is why the TC holder linked the requirement for general visual inspections (GVI) of the airbrake control system to the number of flights (FC) and determined that for this repetitive inspection an interval of 200 flights (FC) ensures the required level of safety.

Considering, that the SZD-54-2 Perkoz is mainly used as a training sailplane and that, therefore, most of its flights are therefore (very) short; (extreme cases are known, where 200 flights (FC) were accomplished in only 20 logged flight hours (FH), your proposal to change the inspection interval from 200 flights (FC) to 100 FH is inappropriate and inconsistent with the TC holder's rational and intentions.

Referring to the example for similar inspections of the airbrake control system required for other Poland-made gliders, it is EASA opinion that: although the basic design of SZD-54-2 Perkoz" and SZD-50-3 Puchacz sailplanes, including the installed airbrake control system, is very similar, the respective maintenance manuals (TSM) define however, besides some similar inspections, also various different inspections, with related inspection intervals which are also not always the same. Also recommended/required (additional) inspections defined in later published SBs are different,



including different intervals, , which are, as usual, based on the experience data and knowledge available at the time of publication of those instructions and depending on the modification status of the installed (airbrake control) systems.

E.g. Puchacz SB BE-062/SZD-50-3/2013 requires for the 'non-reinforced' torsion tube detailed inspections (DETs) at intervals of 12 months or 100 FH, whichever comes first, and for 'reinforced' torsion tubes (only) GVIs at the same intervals, and DETs every 1000 hours.

However, subject Perkoz SB BE-004/54-2/2026, requires for the 'non-reinforced' torsion tube GVIs after every 200 flights (FC or take-offs) and DETs at intervals of 12 months or 300 FH, whichever comes first, and for 'reinforced' torsion tube (modified i.a.w. subject SB) no periodic inspections are required anymore at all; (see also the inspection requirements and terminating Action of subject AD).

Referring to the above, no changes have been made to the Final AD in response to this comment.

Commenter 2: Independent ARS – Egbert Veldhuizen – 25/08/2026

Comment # 2

The PAD No. 26-095 includes the following text:

Inspection(s):

Note 2: The GVI required by paragraph (1) of this AD may be accomplished by a suitably authorised pilot, under the provisions of Commission Regulation (EU) No 1321/2014, Annex II paragraph 145.A.30(j)3 and/or CAO.A.040(c)(1), as applicable; or by a pilot-owner, under the provisions of Annex I paragraph M.A.803 or Annex Vb paragraph ML.A.803, as applicable, of the same regulation.

I miss in the above individual licenced AMT, Part 66, L1, L2 (C). Is there a reason why a pilot owner qualifies, but a licensed Part 66 L AMT not?

Also, you refer to M.A.803. If I have read EU 1321/2014 in valid version correctly, ELA-1 aircraft, including gliders, are subject to the regulations of PART ML.A. So, release to service after inspection by the pilot owner according to M.A.803 is not correct from a legal/regulations perspective.

The text refers to suitably authorised pilot. This can only be a pilot-owner. A random SPL holder, not being owner cannot release the inspection / any work according to ML.A.803. This follows from ML.A. 302 and related paragraphs describing the Aircraft Maintenance Program (AMP).

I appreciate you investigate the above and address the matter in the AD, presuming I interpret your regulations correctly.



EASA response:

EASA does partially agree with this comment.

With regards to the proposal to amend Note 2 of the AD, stating that ‘individually licenced AMTs, Part 66, L1, L2 (C,)’ can (are qualified to) perform the required GVIs, please note that EASA, as well as other Aviation Authorities, never mention or refer in an AD to the ‘lawfully (appropriately) authorised organisations and/or licensed (individual) persons’ who may, and (per definition) should, perform the maintenance tasks and/or other actions required by an AD.

However, under the provisions of, and under the conditions stated in, Commission Regulation (EU) No 1321/2014, Annex II paragraph 145.A.30(j)3 and/or CAO.A.040(c)(1), and Annex I paragraph M.A.803 or Annex Vb paragraph ML.A.803, as applicable, EASA can in certain cases, depending on the kind and type of aircraft (and/or its specific operation) and the nature and complexity of the required action(s) in the AD, allow that ‘suitably authorised crew members, respectively ‘pilot-owners’, may accomplish certain actions; provided that, in such a case, this ‘special allowance’ (under applicable regulation) is explicitly mentioned (made ‘note’ of) in subject AD.

Therefore, we incorporated in subject PAD ‘Note 2’, to address this ‘special allowance’.

EASA makes in ADs, however, use of a more or less ‘standard Note’ (statement) to address this ‘special allowance’; referring to the various regulations, as applicable, which allow the involved ‘crew members’ and/or ‘pilot-owners’ to do so, as applicable, depending on the nature and simplicity of the required action(s), the type of aircraft (either large, small, sailplane, etc.), its operational use and taking into consideration the (foreseen) specific circumstances and/or conditions under which the activities are to be accomplished.

However, considering that, especially in case of ADs which address GA aircraft, this ‘standard Note’ for this ‘special allowance’ obviously might lead to confusion by the person(s) responsible for accomplishment of the required action(s), EASA has decided to incorporate in subject AD and, when applicable, also in future ADs, with regard to this ‘special allowance’, a ‘more specific Note’, that will refer only to the regulation(s) that is (possibly) applicable for the kind and type of aircraft, and/or its specific operation, for which the AD is to be issued.

Finally, with regard to your statement, that a ‘random SPL holder, not being (the) owner’ cannot accomplish and release a certain task or action required by an AD, we like to refer to ‘AMC 1 to paragraph ML.A.803’, addressing the (possible) authorisation of (additional) ‘pilot-owners’.

Referring to the above, in the Final AD ‘Note 2’ has been amended accordingly in response to your comment.

