



9.7.2020

## NOTICE TO MEMBERS

**Subject: Petition No 0740/2019 by Steve Bentley (Bulgarian) on the use of English aviation language in the EU aviation maintenance environment**

### 1. Summary of petition

The petitioner requests the European Commission and the European Union Aviation Safety Agency (EASA) to consider the mandatory implementation of the English language in the Aviation Maintenance communication, documentation and management process in all EU Member States, including with the identification of Aviation English Competence as a fundamental requirement for the staff and authorities involved.

The petitioner recalls the considerable improvement of the safety situation for air passengers when, after the tragic collision of two airplanes in 1977 on Tenerife, English was made mandatory for Pilots and Air Traffic Control, throughout the European Union.

This safety picture could be completed by avoiding safety risks due to lack of understanding, incorrect interpretation of data in areas of Aviation Maintenance.

### 2. Admissibility

Declared admissible on 13 December 2019. Information requested from Commission under Rule 227(6).

### 3. Commission reply, received on 9 July 2020

#### The petition

According to the petitioner, the aviation English language is not mandated within the Aviation Maintenance Environment within Member States. He propose several actions:

1/ all Aircraft Maintenance Organisations, Continuing Airworthiness Management Organisations and Maintenance Training Organisations Company Documentation related to

aviation safety should be in English only (currently this only applies to Flight Deck Documentation) - but should apply to Maintenance Organisation Exposition MOE, Continuing Airworthiness Exposition CAME, Maintenance Training Organisation Exposition MTOE;

2/ Aviation English Competence should be identified as a fundamental requirement throughout all maintenance-related and training organisations – this should be built into the organisations' competence framework and subject to audit by the competent authorities;

3/ competent authorities should be fully conversant with Aviation English and be able to fully engage in English with Industry and to interpret all regulatory, operational and manufacture requirements and standards in the English language;

4/ with immediate effect all company documentation should be acceptable throughout the community in the English language only – within 5 years from adoption the use of any national language within aviation should not be acceptable by the EU or the European Union Aviation Safety Agency (EASA).

### The Commission's observations

English is widely accepted as an international language of [civil aviation](#). The use of a common language is indeed considered a key factor in ensuring aviation safety. Apart from pilots and air traffic controllers there are however no Union (or international) legal requirements for English language proficiency in other aviation sector domains.

As regard the continuing airworthiness of aircraft and aeronautical products, parts and appliances and the approval of organisations and personnel involved in these tasks, Commission Regulation (EU) No 1321/2014<sup>1</sup> as well as the guidance material and accepted means of compliance issued by the European Union Safety Aviation Agency (EASA) allow and in some cases mandate the use of English. The possibility or accordingly the obligation to use English in the aircraft maintenance tasks largely depends on the context and identified needs. For example:

- point 66.A.20, paragraph (b) of Annex III (Part-66) (privileges of certifying staff licence holder, to certify maintenance tasks) requires that the licence holder has the language competence to perform his or her duties in relation to and on the basis of the language in which the related technical documentation and procedures are written. Where such documentation and procedures are written in English, the licence holder must have the required language competence in English: *“(b) The holder of an aircraft maintenance licence may not exercise its privileges unless:*
  - 4. he/she is able to read, write and communicate to an understandable level in the language(s) in which the technical documentation and procedures necessary to support the issue of the certificate of release to service are written.*
- the guidance material to Point 66.B.200 prepared by EASA on Examination by the competent authority (examination before issuing the certifying staff licence)

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<sup>1</sup> Commission Regulation (EU) No 1321/2014 of 26 November 2014 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks, *OJL 362, 17.12.2014, p. 1–194.*

recommends the use of English: “1. *Questions may be prepared in the national language but the use of aviation English is recommended wherever possible*”;

- Appendix VI to Annex III, Issuance of the certifying staff licence of Regulation (EU) No 1321/2014 requires the use of English next to another official language of the Member State: “3. *The document may be filled in either in English or the official language of the Member State of the competent authority. In the latter case, a second copy in English shall be attached to the document for any licence holder who needs to use the licence outside that Member State to ensure understanding for the purpose of mutual recognition*”;
- Appendix II to Annex I of Regulation (EU) No 1321/2014 Issuance of Certificate to release to service, to allow the aircraft to be back to service, mandates the use of English for Certificate to release to service: “2.6. *The Certificate should be in English, and if appropriate, in one or more other languages*”.

It should be noted that the same level of language proficiency as regards certifying staff licence holders (Point 66.A.20, paragraph (b) of Annex III (Part-66)), including language, is required for inspectors of competent authorities as laid down in Point M.B.102 of Annex I (Part-M) and in the accepted means of compliance issued by EASA AMC1 for point M.B.102, paragraph (c) of Regulation (EU) No 1321/2014.

### Conclusion

Given the above, it should be understood that Commission Implementing Regulation (EU) No 1321/2014 mandates the use of a common language that sufficiently allows all maintenance staff, both from operator and competent authorities, to clearly understand each other and to cope with the relevant technical documentation. As the English language is largely used in aircraft maintenance documentation, the Regulation de facto provides sufficient guarantees that English is used and understood by the persons concerned, wherever this is needed.