

Submission

To

CAA Notice of Proposed Rule Making

NPRM 19-04

Part 61 Private Pilot Licence Medical Review

Docket 19/CAR/1

27th January 2020

The Aircraft Owners and Pilots Association of New Zealand (AOPA NZ) has a membership of 1,200. We are the New Zealand representative for a world wide organisation representing over 400,000 pilots and aircraft owners.

We are a member of the Aviation Federation of New Zealand and we whole heartedly endorse their submission to the NPRM 19-04.

We acknowledge the report written by TDB Advisory titled 'Risk analysis of the Proposed Privileges for the Private Pilot Licence Alternative Medical Standard.' We find this report to be well thought out and represent logical risk analysis. Copies of this report are being requested by our sister aviation organisations internationally.

We have been closely involved in the preparation of the Aviation Federation submission; we believe it is professionally produced, uses internationally validated risk assessment tools and applies logical thought processes. The conclusions are consistent. If these conclusions are applied, they will put New Zealand aviation in good standing internationally.

AOPA NZ is represented on the International AOPA committee which has been formed to assist ICAO in modernising its PPL medical standards.

We do not wish to repeat what is well said in the Aviation Federation submission. However, we do wish to acknowledge that our initial submission on this subject called for a motor vehicle medical standard DL9(1) – car licence. We acknowledge that the DL9(P) is accepted by CAA and we are comfortable with this. Our main objective is/was to have a licence standard which can be administered by the pilots own GP, this is convenient and saves money.

Our membership will be very happy when they can fly with 5 passengers, 2,730kg aircraft plus over built up areas, on what is effectively the RPL medical.

We are totally supportive of the Aviation Federation submission in calling for the inclusion of twin aircraft, pressurised aircraft, night flight, IFR flight, aerobatic ratings, agricultural flying and banner and drogue towing within the DL9(P) medical standard.

We have spent time comparing the DL9(P) medical standard to the CAA Class 2 medical standard. This is a daunting task as it effectively involves taking a comprehensive medical text book and seeing how each disease and variation of the disease is managed by the respective standards. It is only practical to take a selection of common diseases and compare how the different medical standards deal with these. It is our conclusion that the medical standards are similar. We do not believe the DL9(P) is an inferior standard to the CAA Class 2. This is consistent with our experience of the RPL pilots having no aviation incidents due to medical causes.

Thank you for considering our concerns represented in this submission. We look forward with expectation to seeing the suggested amendments included in the final revised version of these rules.

Stephen Brown FRNZCGP

President

The logo for the Aircraft Owners and Pilots Association of New Zealand (AOPANZ) features the acronym 'AOPANZ' in a bold, blue, sans-serif font. The letters are closely spaced, with the 'O' and 'P' being particularly prominent.

AIRCRAFT OWNERS AND PILOTS ASSOCIATION OF NEW ZEALAND

