



**LIETUVOS RESPUBLIKOS TEISINGUMO MINISTERIJOS
SAUGOS TYRIMŲ SKYRIUS**

**SAFETY INVESTIGATION DIVISION
OF MINISTRY OF JUSTICE OF THE REPUBLIC OF LITHUANIA**

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European Union Aviation Safety Agency

On 2023-03-31 No. LITH-2023-001,
No. LITH-2023-003,
No. LITH-2023-004,
No. LITH-2023-005,
No. LITH-2023-006,
No. LITH-2023-007,
No. LITH-2023-008,
No. LITH-2023-009,
No. LITH-2023-010,
No. LITH-2023-011,
and 2023-07-14 No. LITH-2023-002

ON THE EVALUATION OF THE RESPONSE TO THE SAFETY RECOMMENDATIONS

Pursuant to Article 18(2) of Regulation (EU) No 996/2010 of the European Parliament and of the Council of 20 October 2010 on the investigation and prevention of accidents and incidents in civil aviation and repealing Directive 94/56/EC (hereinafter referred to as "Regulation (EU) No 996/2010"), we hereby inform you that the response to safety recommendations No SR-2022-A-02, No SR-2022-A-03, No SR-2022-A-09, No SR-2022-A-13, No SR-2022-A-14, No SR-2022-A-15, No SR-2022-A-16 and No SR-2022-A-17 is evaluated as appropriate and the status of these safety recommendations will be set to 'Closed – Adequate'.

Additionally, we hereby inform you that we do not agree with the decision to take no actions with regard to the implementation of Safety Recommendations No SR-2022-A-10, No SR-2022-A-11, and SR-2022-A-12.

The Safety Recommendation SR-2022-A-10 was issued in the light of the requirements for commercial aircrew flight duty times not being applied to the flight instructors of approved training organizations. While the requirements approved training organizations oblige these organizations to establish internal requirements for flight duty times, there are no common guidelines on the maximum duty hours. Considering that the safety level in the training organizations should be



maintained at the same level as in the commercial air transport, and taking into account that approved training organizations may operate in several states, establishing common requirements should have a positive influence on safety level.

The Safety Recommendations SR-2022-A-11 and SR-2022-A-12 were issued in the light of the FLT requirements for controlling the duty times and rest periods, when a crew member is working in more than one operator, and the obligation of sharing this information between these operators, not being applied to the approved training organizations, when an instructor is working in more than one organization. Considering that the safety level in the training organizations should be maintained at the same level as in the commercial air transport, and taking into account that approved training organizations may operate in several states, establishing common requirements should have a positive influence on safety level.

It should be noted that during the consultation on the Safety Investigation Report, including the Safety Recommendations, these Safety Recommendations were not objected by any parties. In view of this, the status of Safety Recommendations No SR-2022-A-10, No SR-2022-A-11 and No SR-2022-A-12 will be set to 'Closed - Not adequate.'

Yours sincerely,

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