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

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To Lithuanian Transport Safety Administration

With reference to 2024-12-23 No. 15B-10647

For information of
the Ministry of Transport and Communications of the Republic of Lithuania
Transport Competence Agency

**ON THE EVALUATION OF THE RESPONSE TO THE IMPLEMENTATION OF A SAFETY
RECOMMENDATION**

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 we do not agree with the decision to take no action with regard to the implementation of Safety Recommendations No SR-2024-A-06 and No SR-2024-A-07.

Contrary to the opinion of the Lithuanian Transport Safety Administration, the Safety Investigation Division of the Ministry of Justice of the Republic of Lithuania considers that the existing regulation on the renewal of Special Airworthiness Certificates for experimental category aircraft is not appropriate and cannot ensure aviation safety. This opinion is supported by the experience of safety investigations of accidents involving experimental category aircraft with fatal injuries to persons. Therefore, there is always a possibility to improve the existing regulation so that the Special Airworthiness Certificate could be renewed not only by the Transport Competence Agency, but also by persons approved by the Agency, such as those specified in points 15.1 to 15.3 of the Description of Airworthiness and Maintenance Requirements for Experimental Category Aircraft, approved by the Order of the Director of the Lithuanian Transport Safety Administration of 23 December 2024 No 2BE-252 "On the Approval of the Description of Airworthiness and Maintenance Requirements for Experimental Category Aircraft". It should be noted that during the consultation on the Safety Recommendation, both the Ministry of Transport of the Republic of Lithuania and the Transport Competence Agency agreed with the Safety Recommendation. In view of this, the response on the implementation of Safety Recommendations SR-2024-A-06 and SR-2024-A-07 is assessed as inadequate and given a status of 'closed - response inadequate', while Safety Recommendation SR-2024-A-08 is given a status of 'open - response partially adequate'.

In accordance with Article 18(2) of Regulation (EU) No 996/2010, we would also like to inform you that we consider the response on the planned implementation of Safety

[...]



Recommendations SR-2024-A-09, SR-2024-A-10 and SR-2024-A-11 to be satisfactory. The status of the safety recommendations is 'open - response adequate'. Once all actions have been implemented, please inform us so that the status of the safety recommendations can be changed.