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LIETUVOS ULTRALENGVŪJŲ ORLAIVIŲ PILOTŲ FEDERACIJA

Safety Investigation Division of the Ministry of Justice
of the Republic of Lithuania
[...]

2025-05-11

On 2024-09-17 No.(8.4.4 E) 3A-264

ON SUBMISSION OF SAFETY INVESTIGATION REPORT AND SAFETY RECOMMENDATIONS

After familiarization with the Safety Investigation Report of an accident to an ultralight aircraft Bristell UL HD, LY-LIS, that occurred on 8 August 2022 in Armaniškės village, Ringaudai municipality Kaunas district (hereinafter – Safety Investigation report) and the safety recommendations addressed to the Lithuanian Ultralight Aircraft Pilots Federation, we hereby provide the evaluation of these safety recommendations and implementation timelines.

On Safety Recommendation No SR-2024-A-03. It is recommended that the Lithuanian Ultralight Aircraft Pilots Federation modify the Practical training program of ultralight aircraft pilots (RAL class ULO aircraft) (ULO PMPA v2.3) establishing a safe altitude for stall training.

Recommendation implemented. In the syllabus for the practical training of pilots of ultralight aircraft (RAL class ULO aeroplanes) (ULO PMPA v2.6) (hereinafter referred to as the 'ULOPF syllabus'), paragraph 4.6, defining Exercise 6 (Glide, stall, true airspeed), and paragraph 4.17, defining Exercise 17 (Glide, stall), the Safe Stall Altitude is set at 3 000 ft. The updated syllabus is available here: <https://www.ulopf.lt/wp-content/uploads/2024/03/RAprograma-2024-03-23.docx>

On Safety Recommendation No SR-2024-A-04. It is recommended that the Lithuanian Ultralight Aircraft Pilots Federation modify the Practical training program of ultralight aircraft pilots (RAL class ULO aircraft) (ULO PMPA v2.3) so that the emergency landing training procedures are performed without shutting down the aircraft engine.

Recommendation not implemented. We assess that the implementation of the recommendation would lead to a possible decrease rather than an increase in safety.

Please note that ultralight aircraft are classified as experimental aircraft. All manufacturers of ultralight aircraft engines also emphasise that "<...> this engine does not meet the requirements of established certified aviation engines, and therefore the pilot must fly in such a way that, in the event of an engine failure, the pilot will be able to land the aircraft safely <...>". Ultralight pilot training programmes in all EASA (and not only) countries are based on this information and train ultralight pilots accordingly, "In the event of an engine 'failure' (malfunction, stoppage), the pilot must be able to assess the situation and be trained to take actions to land the aircraft safely and without causing harm or damage to persons and/or property or to the minimum extent possible. The provision in the Recommendation that such training should take place without the engine being switched off would not be consistent with the actual flight conditions in the event of an engine failure (an engine running at idle speed stops the aircraft),

and we therefore consider that the application of this Recommendation is inappropriate and would result in a deterioration of the pilot's qualification. In addition, we note that the emergency landing training is conducted only with an instructor and the exercise description states that the instructor is responsible for the safety of the task. We consider that the provisions of the ULOPF syllabus, the RAL Pilot Training Methodology (RAL PMM v 1.0) and the provisions of the ULOPF syllabus, provide the prerequisites for a high level of safety in the scope of the implementation of the emergency landing training procedures.

On Safety Recommendation No SR-2024-A-05. It is recommended that the Lithuanian Ultralight Aircraft Pilots Federation modify the Practical training program of ultralight aircraft pilots (RAL class ULO aircraft) (ULO PMPA v2.3) to comply with the Visual Flight Rule.

Recommendation not implemented. The recommendation relates to Exercise 8 of the ULOPF syllabus, 'Aerial site selection, evaluation and use', which states in the description that site inspection is allowed at altitudes lower than 20 m. For the assessment of this exercise, the Report refers to the Visual Flight Rules, which state that flights shall not be conducted below 150 m above ground level. It further states: *"During the safety investigation, the European Union Aviation Safety Agency also stressed that flights must comply with the rule "SERA.3105 Minimum Altitude" at all times, except when take-off or landing is necessary or when cleared by the competent authority, and therefore, especially during training, the requirements must be complied with and flights must not be conducted below 150 m."*

Please note that Exercise 8 of the ULOPF syllabus is designed to provide practical training in emergency landing. The essence of this exercise is that in an emergency situation the pilot must be able to select a suitable landing site. Such a landing is simulated without actually performing the landing action. In this exercise, the landing manoeuvre is aborted at an altitude of 50 metres, the engine power is increased and the descent procedure is continued. This manoeuvre allows the instructor and the pilot to assess whether the pilot's choice was appropriate when passing the selected site at 50 metres.

The Recommendation refers to the part of the Commission Implementing Regulation (EU) No 923/2012 (SERA) "SERA.3105 Minimum altitude" and the related part SERA.5005(f), which specifies the exception to the minimum altitude as "*<...> Except when the aircraft is required to take off or land <...>*". Exercise 8 of the training programme is the emergency landing simulation and we consider that the training programme is in compliance with the rules of the European Union Aviation Safety Agency. Also, changing the altitudes of this exercise would not provide pilots with the necessary competences and skills to perform emergency landings and would have a negative impact on flight safety.

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