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

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Lithuanian Ultralight Aircraft Pilots Federation

On 2025-05-11 letter

**ON THE EVALUATION OF THE RESPONSE TO THE SAFETY RECOMMENDATIONS'
IMPLEMENTATION**

In accordance with 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, we hereby inform that the measures implemented by the Lithuanian Ultralight Aircraft Pilots Federation are in line with the objective of the Safety Recommendation No SR-2024-A-03, and we consider the response to the Safety Recommendation No SR-2024-A-03 to be appropriate. Safety Recommendation SR-2024-A-03 is given the status 'closed - implemented'.

The Safety Investigation Division disagrees with the opinion of the L Lithuanian Ultralight Aircraft Pilots Federation that the initial training programme for ultralight pilots should include emergency landing training with the engine switched off. The difference in the flight performance of the aeroplanes between a full engine-off glide and a minimum engine speed glide is negligible. At that time, full engine shutdown increases the likelihood of not starting the engine at the right moment, increasing the possibility of turning a simulated emergency into a real emergency, which both the student and the instructor may not be able to handle without experience and skill. Also, according to the training practices examined in the safety investigation in other countries, it is not recommended for safety reasons in initial pilot training programmes that emergency landing training in single engine aircraft should be performed with the engine switched off. In view of this, we consider the response to Safety Recommendation SR-2024-A-04 to be inadequate and the status of Safety Recommendation SR-2024-A-04 is 'closed - not implemented'.

The Safety Investigation Division also disagrees with the opinion of the Lithuanian Federation of Pilots of Ultralight Aircraft that a simulated emergency landing is a landing of an aircraft and that such a landing manoeuvre, which is terminated at an altitude of 50 metres, is not in contravention of the visual flight rules. During the safety investigation, the European Union Aviation Safety Agency (EASA) pointed out emphatically that flights must at all times comply with the 'SERA.3105 Minimum Altitude' rule, except when a take-off or landing is necessary, or when authorised by the competent authority, and that therefore, in particular, during training, the requirements must be complied with and flights must not be performed below 150 m. The simulation of an emergency dive landing, with an aborted approach, does not constitute a landing, and that therefore this exercise altitude is contrary to 'SERA.3105 Minimum Altitude' rule. In view of this, we consider the response to Safety Recommendation SR-2024-A-05 to be inadequate and the status of Safety Recommendation SR-2024-A-05 is 'closed - not implemented'.

