EHA Position Paper – Timing of Routine Rule-Making Updates

Executive Summary

The European Helicopter Association (EHA) proposes that EASA adopt a structured, twice-yearly cycle for the release of routine rule-making updates. This approach would reduce administrative burden on operators, improve predictability, and strengthen the focus on rotorcraft-specific needs within EASA.

Urgent, safety-critical, rule-making should continue to be processed outside this cycle, but only as an exception with clear justification. Beyond rule-making, EHA notes that OEM-driven revisions to Flight Manuals and MMELs also generate significant resource demands for operators. Addressing this issue will be the next objective in EHA's regulatory efficiency efforts.

1. Background and Context

The European rotorcraft community faces a chronic administrative burden arising from many incremental regulatory changes released throughout the year. The analysis of the EPAS Volume II rotorcraft rule-making timeline illustrates a dense spread of overlapping RMTs affecting Air Ops, Continuing Airworthiness, Initial Airworthiness, Licensing, FSTD, and VTOL developments. Operators, especially SMEs, lack the bandwidth to continually assess, plan, and implement frequent regulatory updates.

2. A Predictable, Twice-Yearly Regulatory Cycle

To address this challenge, the EHA recommends that EASA combines routine regulatory updates into two scheduled release windows per year: For example, April and October.

This structured approach would:

- Allow operators and competent authorities to plan compliance activities more efficiently;
- Reduce the administrative churn created by constant minor rule changes;
- Enable more coordinated communication and safety promotion from EASA;
- Support better resource allocation among operators, training organisations, and maintenance providers.

3. Handling Urgent Safety-Critical Regulatory Needs

The EHA recognises that not all rule-making can be planned in this way. When emerging safety concerns require immediate regulatory action, EASA should retain the ability to issue updates outside the semi-annual cycle. However, such exceptions should be accompanied by a clear safety case and justification. This principle aligns with EHA's long-standing position that safety, not administrative or political drivers, must be the foundation of every regulatory change.

4. Reducing the Burden of OEM-Driven Flight Manual and MMEL Updates

In parallel with regulatory updates, operators face a substantial and growing burden from frequent OEM updates to Aircraft Flight Manuals (AFMs) and Master Minimum Equipment Lists (MMELs). These revisions require internal review, operational assessment, crew training updates, and procedural amendments. EHA considers this an essential next target for collaborative efficiency improvements, and recommends establishing a joint EASA-OEM-Operator working group to identify ways to:

- Reduce unnecessary revision frequency;
- Improve predictability of OEM documentation release cycles;
- Ensure safety-critical changes are prioritised without overwhelming operators.

5. Strengthening Rotorcraft Focus within EASA

A move to structured rule-making cycles would support the broader objective of improving the visibility and priority of rotorcraft-specific issues within EASA. As highlighted in previous EHA proposals, the creation of a Rotorcraft & VTOL Champion within EASA would act as a focal point for cross-directorate alignment and ensure that rule-making activities reflect operational realities and safety priorities in the rotorcraft domain.

6. Conclusion and Way Forward

The EHA calls on EASA to adopt a twice-yearly cycle for routine rule-making updates, with exceptional pathways preserved for urgent safety matters. This predictable structure would significantly reduce administrative burden, improve safety planning, and enhance regulatory coherence across the rotorcraft community.

In addition, EHA will pursue efforts to address the parallel challenge of OEM-driven AFM and MMEL updates.

Through structured rule-making, better planning, and clearer prioritisation, Europe can achieve a more efficient and safety-centred regulatory framework for rotorcraft operators.