



SIL/PT Gliding Winter Day 2026

Part-66L development

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Current 66.A.20(b)

**66L recency
issue...**



L licence holders shall demonstrate 6 months of maintenance experience in the preceding 2-year period



AMC of the 66.A.20 (b)(2)

100 days of maintenance experience

Background

reduced by 50% when agreed in advance by the competent authority



50 days of maintenance experience



Revise the rule or option for AltMoC?

Possible way forward...

Maintenance experience over a 2-year period

4 annual/100 hr inspections

Each missing inspection shall be replaced by 5 maintenance tasks

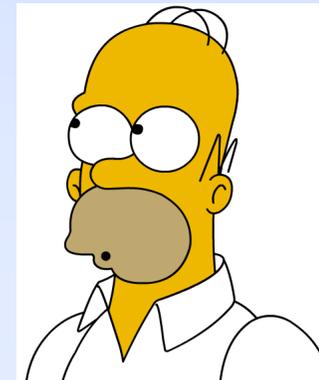


4 annual/100 hr gives 8-16 days

Background



A typical annual inspection and maintenance of a sailplane takes about 2-4 days...





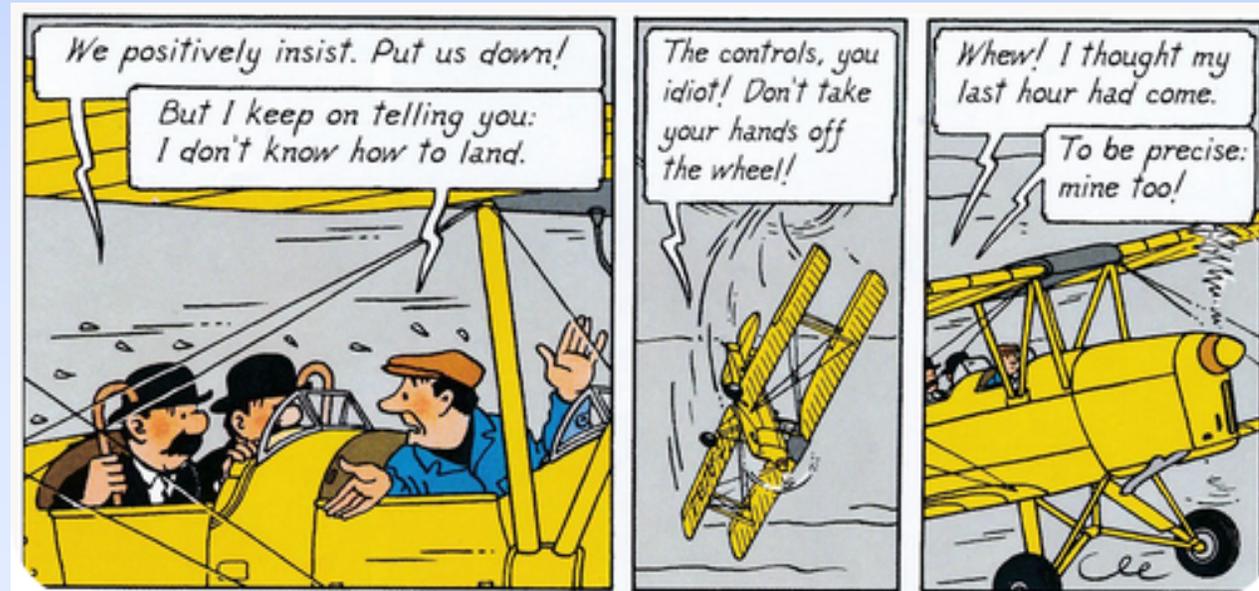
EASA has committed to changing the requirements (via rulemaking in the coming 1-2 years) to enable recency to be supported at all times by practical experience equivalent to that required for the issue of the glider License holder rating.

This would then be an alternative route for legal recency for Engineers who do not meet the (rolling) requirement of 100 days work in the previous 2 years.

Using the new interpretation, only practical work is considered: there is no requirement for any repeat of theoretical study or examinations.

Background

Under the new interpretation, 66L will need to be demonstrate, **by logbook or other work record evidence, that a “representative cross section of maintenance tasks”** have been undertaken in the preceding 2 years.



Background

EASA, **EGU**, EBF and EAS are working on agreed examples of “representative sets of maintenance tasks”.



There is a list of tasks for 66L given in Appendix II to AMC to Annex III section (1)C of Part 66.

Some of these tasks are never, or very rarely done as a working 66L, even though they may be covered during training. The Part 66 list should be considered a list of possible tasks, from which any License holder can take those which are relevant and representative of their own specific work as a glider Engineer.

Background



A “representative set of maintenance tasks” will vary from one license holder to another.

For example, if a license holder primarily works on annual inspection and on rectification (follow-up maintenance) of defects arising from annual inspections, then their recency could be based on doing a reasonable number of such inspections and follow-up maintenance actions.

EGU believes that the Part 66 task list specification for annual inspections (including follow-up maintenance) would be the bare minimum (per 2 years).

Background

EASA has updated its Frequently Asked Question FAQ **19023** on Part 66 License holder recency, “Is there a requirement to have 6 months’ experience every 2 years to maintain the validity of the Part-66 licence? |



EASA”. This FAQ covers all such license holders, so is somewhat complex.

The full text is here: <https://www.easa.europa.eu/en/faq/19023>.

Step forward

The Agency Newsroom & Events Domains Regulations Document Library

Home / The Agency / Frequently Asked Questions / Point 66.A.20(b)(2) requires in the preceding 2 years, 6 months of exp

FAQ n.19023

FAQs: Privileges of a Part-66 licence, Part-66, Continuing Airworthiness, Regulations

Point 66.A.20(b)(2) requires in the preceding 2 years, 6 months of experience or to meet the provisions for the issue of the appropriate privileges. What does it mean? Does it affect the



EXTRACT from EASA FAQ 19023 as relevant for Part 66L License Holders working on gliders

As a holder of an aircraft maintenance licence, to exercise your certification privilege in accordance with **66.A.20(b)(2)**, please ensure:

- **You have accumulated 6 months of experience in the previous 2 years;**
- Note: see also AMC 66.A.20(b)(2)** for possible reductions of experience, in particular for independent certifying staff. Demonstration of experience should be made on the particular or similar aircraft. Guidance on ‘similar’ aircraft is also provided in AMC 66.A.20(b)(2).

Or...



or

- **You can demonstrate that in the last 2 years, you have met the provisions for the issue of appropriate privileges**, which means (refer to **66.A.45**), as applicable to the case:

- for L-category licences (other than L5), being able to demonstrate, in the last 2 years, practical experience, **which shall include a representative cross section of maintenance activities** relevant to the licence subcategory (B2/B2L, L1, L1C, L2, etc.)

Note: “A representative cross section of maintenance activities” means representative cross-section of the tasks listed in **Appendix II to AMC to Annex III (Part-66) “Aircraft Type Practical Experience and On-the-Job Training - List of Tasks”**.

“Demonstrate” means having a record thereof, such as a logbook.

Note: GM 66.A.20(b)2 will be reviewed and amended according to this interpretation through rulemaking task RMT.0735.

NPA 2025-12



Regular Update of the Continuing Airworthiness
Regulation (1321/2014)



European Union Aviation Safety Agency

Notice of Proposed Amendment 2025-12 (B)

in accordance with Article 6 of Management Board Decision 01-2022

**NPA 2025-12(B) – Proposed amendments to Regulation (EU) No
1321/2014 and associated AMC and GM**

**Rulemaking
update**

Please support this by commenting the NPA

NPA 2025-12



**AMC2 66.A.20(b)(2) – Task-based recency (as an alternative to unrealistic time-based requirements.
- Proposal is supported!**

GM1 66.A.20(b)2 – How to achieve task based recency - Proposal is supported!

GM1 66.A.20(b)(3) – Clarification regarding competence of independent 66 - Proposal is supported!

Please support this by commenting the NPA



ANNEX III (PART-66)

SECTION A — TECHNICAL REQUIREMENTS

AMC2 66.A.20(b)(2) Privileges

REGENCY DEMONSTRATION FOR L1, L2 AND L3 LICENCE SUBCATEGORIES

For the L1, L2 and L3 licence subcategories, the following provides one means of showing compliance with point 66.A.20(b)(2) through the provision 'met the provision for the issue of the appropriate privileges' by demonstrating practical experience and associated representative cross-section of maintenance activities as explained in point (b)(3) of GM1 66.A.20(b)2.

- Holders of an L1C, L1, L2C or L2 subcategory licence should be able to demonstrate having carried out six annual inspections on (powered) sailplanes in the preceding 2 years, spread over this period. In addition, recurrent practical training should be considered.
- Holders of an L3H or L3G subcategory licence should be able to demonstrate having carried out 10 annual inspections on balloons in the preceding 2 years, spread over this period. In addition, recurrent practical training should be considered.

In this context, 'carrying out annual an inspection' includes carrying out any additional maintenance tasks performed on the occasion of the annual inspection, including those necessary to rectify the findings from the annual inspection (e.g. minor repair, replacement of parts, rigging). All this maintenance should be properly documented and retained as required by point ML.A.402(b) (e.g. by means of a personal logbook).

Rationale:

- This proposal for a new AMC results from an exercise conducted with sailplane and balloon associations. They have analysed the annual inspections tasks and collected data from a sample of annual inspection, looking at the findings and resulting follow-up tasks (necessary to rectify the findings). These were then compared with the list of tasks in the Appendix II to AMC to Annex III, and discussed with EASA to determine to which extent a number of annual inspections (and their follow-up tasks) can cover a representative cross-section of maintenance activities in this Appendix II, hence providing a means to comply with recency requirements for L1, L2 and L3 licences subcategories.



6 annual inspections

AMC2 66.A.20(b)(2) – Task-based recency (as an alternative to unrealistic time-based requirements. - Proposal is supported!



GM1 66.A.20(b)2 Privileges

The sentence 'met the provision for the issue of the appropriate privileges' included in 66.A.20(b)2 means that during the previous 2 years the person has met all the requirements for the endorsement of the corresponding aircraft rating (ref. 66.A.45) ~~(for example, in the case of aircraft in Group 1, theoretical plus practical element plus, if applicable, on-the-job training).~~

- (a) For the initial endorsement of the aircraft maintenance licence (AML), ~~this supersedes the need for 6 months of experience for the first 2 years. However, the requirement of 6 months of experience in the preceding 2 years will need to be met after the second year.~~
- (b) This provision may be used as an alternative to the requirement of 6 months of experience in the preceding 2 years. Recency may be established by demonstrating that within the preceding 2 years:

3. for an AML that allows endorsement through demonstration of practical experience (e.g. a B2/B2L licence endorsed with a full group 3 or 4 rating or a L-category licences other than L5), the holder had practical experience and performed a representative cross-section of maintenance activities relevant to the licence subcategory, as evidenced through the appropriate records (e.g. a personal logbook).

NOTE: Being able to demonstrate recency does not mean that one is competent to do all the tasks under the scope of the privilege held. Please refer to point 66.A.20(b)(3) and its AMC and GM.

GM1 66.A.20(b)2 – How to achieve task based recency - Proposal is supported!

Rationale:

- *This proposal for an interpretation of 'met the provision for the issue of the appropriate privileges' has been developed and discussed with the GA TeB and P&CA TeB to help addressing the challenge of recency demonstration for holders of L category (other than L5) licences. Through this interpretation, they may show compliance with point 66.A.20(b)(2) by being able to demonstrate having carried out a representative cross-section of maintenance activities (instead of 6 months of experience) within the last 2 years.*



GM1 66.A.20(b)(3) Privileges

ADEQUATE COMPETENCE TO CERTIFY MAINTENANCE

In the case of independent certifying staff, the sentence *'The holder of an aircraft maintenance licence may not exercise its privileges unless he/she has the adequate competence to certify maintenance on the corresponding aircraft'* means that he/she is responsible for ensuring his/her own competency, including recency, for the maintenance that is intended to be carried out and certified.

In case of doubt, for example in case of an infrequent complex maintenance task, the independent certifying staff should ensure that he/she has the appropriate recency and/or has been recently (re)trained on the particular task. If not, it is expected that he/she will refrain from performing that maintenance task, and the person or organisation responsible for the aircraft continuing airworthiness will find an alternative solution for the aircraft maintenance to be performed.

'Training' in this context means any form of hands-on or practical training with documented assessment/supervision.

**GM1 66.A.20(b)(3) –
Clarification regarding
competence of independent 66
- Proposal is supported!**

Rationale:

- This proposed GM has been developed during the discussion with the sailplanes and balloon association (see rationale under AMC2 66.A.20(b)(2)) to highlight that being able to demonstrate recency does not mean that one is competent to do all the tasks under the scope of the privilege held. It is the responsibility of the certifying staff to ensure their competency before performing and releasing a maintenance task.*

Future works – a development of 66 Light regulation



Any future simplification of the rules should comply with the following principles:

Preservation of Independent Certifying Staff

The regulatory framework shall continue to permit individuals to act as independent certifying staff without mandatory affiliation to a maintenance organisation, provided they meet the applicable competence and qualification requirements.

Modular Licensing Structure

The licensing system should allow for a modular approach, enabling applicants to obtain privileges limited to defined areas of competence (e.g. powerplants, non-powered airframes, metal structures, composite structures). This modularity is intended to improve accessibility while ensuring adequate control of safety-critical activities.

Future works – a development of 66 Light regulation



Why is this rule problematic and should be simplified?

- The regulation of Part 66 is over-complex regarding training, licensing and maintaining part-66L-licences working on sailplanes and other light aircraft
- The "employer model" is incompatible with often volunteer and part-time specialist technician who have no interest in becoming full-time professionals
- Recency requirements are too hard to achieve. Part-66L personnel are retiring at a far faster rate than new part-66L are qualifying and a crisis is foreseen soon in many geographical areas

Simplify EASA!
Stakeholder Feedback on the Simplification of the
EASA Legal Framework

Future works – a development of 66 Light regulation



What solution do you propose to simplify?

- An entirely separate Part-66L (ref Part ML vs Part M) should be created, with genuinely proportionate and achievable training options.
- Qualifications and release to service privileges should be more modularised.
- Recency requirements should be realistic. Training and qualification under supervision of a national sporting federation or equivalent should be an option.

Questions?

