

**The Swedish Association of Flight Instructors
(Svenska Flygutbildarforeningen, SFUF)
has the following position
on NPA-2008-17.**

SFUF represents 200 active flight instructors in Sweden, of which many also fly commercially.

SFUF agrees that General medical practitioners (GMP) can do medical assessments of all pilots, that are not flying for commercial purposes.

In addition to the NPA, SFUF recommends that GMP will get the privilege to make examinations for PPL holders and CPL holders who not fly commercially. Since this is a deviation from an ICAO standard, the difference has to be notified to ICAO. This is a step in the right direction to reduce the cost while maintaining a high level of flight safety.

The distance to any aero-medical doctor is for many pilots 100 or 200 kilometers one way. When the cost for the trip to the doctor is higher than the examination itself, there must be a system error. Therefore, the EASA should allow also for PPL and LPL holders to take the medical assessment at any general medical practitioner, and the allow for the CAA or any other certified body, to issue the medical.

This above mentioned system was used in Sweden before JAR-FCL, with good results. The only checks that had to be done by Aeromedical examiners were

1. First evaluation Class I and Class II
2. Yearly examinations of Class I medical.

Thereafter the CAA issued the Certificate.

Sweden is a large country with low population density and SFUF strongly suggests that the agency let PPL and LPL holders go to GMPs. This system has already worked in Sweden for many years with no known impact to flight safety according to a long track record within Sweden.