There are universal opposition to many regulations, including European regulations, have to be challenged by a Regulatory Impact Assessment (RIA) and increasing Pre-RIAs, which ask whether regulatory action is needed at all. In these, the appropriate regulator sets out the driver for making the proposals (e.g., an accident investigation recommendation or emerging safety problem identified in the European Aviation Safety Plan; stakeholder needs; etc.) and assesses the safety, social, economic etc. impacts. The RIA requires rules to be developed in conjunction with the industry, often through working groups with membership drawn from industry representatives, and proposals are subject to several rounds of consultation and scrutiny at the EASA Committee. Therefore there is opportunity for the safety benefits to be assessed throughout the development of new regulations. Nevertheless, whilst the safety and other impacts are assessed and documented in the development of new regulations, it is recognised that these may not be easily accessible to the wider group of stakeholders.

The standards applied to Certificates of Airworthiness are derived from EASA. The underlying principle is that an aircraft qualifies for a certificate issued by EASA and the CAA if it is shown to meet the requirements of all parties and the CAA ensures that the overall benefits are notified to industry.

It is a government policy that the CAA never considers to freeze CAA controls entry into the market and to make a £1.8 million investment. The charges are reviewed continually with industry representatives in the Finance Committee and all changes are consulted upon publicly each year.

The CAA has the recognised need for its enforcement policy and for the enforcement actions it takes, to be more visible to industry and work is in hand to ensure this greater visibility. The role and responsibilities of the CAA as a regulator do not differ from those of any other regulator and the primary responsibility for rulemaking activity is increasingly moving to the EASA. The CAA has processes in place to help ensure that it acts fairly and consistently in exercising all its duties. For example, in those areas where the CAA sets rules, it does so only after consultation with industry, our response to any findings of non-compliance are harmonised across the different industry sectors and itself complete with the EASA requirements. There is a statutory right of review (appeal against any refusal, suspension or revocation of a licence, certificate or approval issued by the CAA). The applicant is not content following this Regulation 6 review, they may pursue judicial review. The outcome of any prosecution is decided by the courts, not the CAA. Only a very small number of serious offenders are prosecuted and only when the public interest is served by doing so. In most cases any CAA action is focused on improving industry’s safety, performance, by education, re-training or licensing action.

The CAA has developed an improved communications strategy and is working to be more transparent. As part of this work, for example, the CAA will publish in October a new set of bulletins that explain the pilot licensing regulations in a cleaner, more accessible format in addition to the basic requirements contained in the publication CAP 804.

The CAA does not agree with the comment. We already delegate where we can (and where competence is demonstrated) within the constraints of the regulations. We believe that part of the apparent misunderstanding here may be due to industry not recognising the extent to which it is very easy to delegate powers to representatives bodies who have demonstrated the competence and durability to take on such a role. Examples are the armonisation of helicopter and microlight aircraft which the CAA and BMAA handle respectively, and the NIRP, where applications are processed by HVA Ltd and the BMAA respectively and the CAA only issues the licence. The CAA will respond to other bodies wishing to take on delegated powers where they can prove competence to do so. However, the level of delegation that may be given to approved organisations and their personnel are almost all defined in European regulations.

The CAA is committed to ensuring that new regulations developed in the UK are assessed in accordance with Government Better Regulation principles including an assessment against effects on safety, and in ensuring transparency. The CAA will also commit to continuing to work with EASA to develop its Regulatory Impact Assessment process following similar principles.

In addition the CAA is committed to achieving a proportionate balance between regulatory and non-regulatory interventions. Finally, the CAA has established a “gold-plating” review team to identify areas of functionality which are shown to add unnecessary cost and regulatory burden for no safety benefit.

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The CAA does not agree. As a specialist aviation regulator the CAA is obliged to develop and apply interventions (regulatory or otherwise) to mitigate identified safety risks, the CAA is all regulators, is able to apply its judgement in the application of such regulation proportionate to the situation.

The CAA will introduce a risk-based regulation where possible and appropriate - or encourage EASA to do so in the case of EU Regulations. But many other criteria - e.g. minimum age to hold a licence - must remain for the regulatory system to function. The CAA will commit to being transparent in all of its regulation so that the basis for its decisions are clear.

The CAA publicises its scheme of changes annually. These changes are set and agreed with the industry in the Finance Advisory Committee, which includes representatives from the GA sector.

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Common Themes:

Regulation should be proportionate to risk and recognise that participants accept a higher level of risk.

It is the CAA's objective to ensure that Regulation is proportionate to risk and we are acting in trying to influence Europe to adopt such principles. For example, the CAA is leading presentations on Risk and Performance Based Oversight at a major EASA/EASA Conference and at an EASA Workshop on Risk based Oversight methods, both in June. The CAA's RA2 study identified areas in which to bring this approach to recreational aviation. The CAA has appointed a GA programme manager, who joins us in June, to progress this work.

Problems:

Europe - Problems

EASA increases costs and red tape without improving safety. This is made worse by the CAA. EASA deliberately writes vague regulations to give leeway, but CAA takes restrictive interpretation.

It is true that some problems and uncertainties have arisen during the transitional implementation of European Regulations which necessarily requires interpretation. The CAA will commit to reviewing cases where industry identifies that the CAA has imposed more restrictive interpretations than intended by the requirement.

The uncertainties usually arise because some circumstances were not taken into account during rulemaking, or because different rule-making groups reached different conclusions and it was not realised that the resulting rules would have an interdependency or be in conflict. Where issues can be identified they are discussed between EASA and the Member States to try and agree a common, pragmatic interpretation. The CAA publishes these interpretations to try to give certainty to pilots, training organisations and airlines over what is required of them, to help them to plan effectively and not be "caught out" by changing interpretations.

The European Commission has recognised that GA needs a sustainable future and has directed EASA to review rulemaking that has impacted unfavourably on GA. This activity is in progress.

Europe - Problems

CAA is permitted to not pull back against EASA over-regulation.

We refer to paragraph 22.

Europe - Problems

The FCL transition has meant being towing privileges and pilots are expected to pay for things they didn't ask for. It also invalidates FAA piggyback licenses.

The issue is a harmonised European licensing system that has necessarily meant a change in both the privileges and obligations for pilots, especially for aircraft other than aeroplanes and helicopters, which were not within the scope of JAR-FCL. Whenever possible the regulations have grandfathered the rights of existing licence holders and/or allowed for transitional periods during which adjustments can be made. The new Part-RAA has imposed a new workflow per UK licence serial numbers, (GBR in place of UK), which may mean that FAA licences issued on the basis of US licences have to be re-applied for - this depends on FAA policy.

However, the European Commission is pursuing a bilateral agreement for pilot licensing with the USA, which it is hoped will simplify the use of US (and other EU Member State) issued Part-FAA licences in the UK and vice versa. This may render these so-called piggyback licences redundant to the benefit of the pilots.

We believe this to be a misunderstanding of the role and extent of involvement of the CAA with EASA. The CAA is committed to work with industry to improve the visibility of its work in this area, and the outcomes that are achieved.

Europe - Problems

EASA has increased its role from being a regulator to being a regulator and policy-making group. EASA was previously a regulator focusing on technical issues and did not have much involvement in rule-making groups or consultations and in supporting DfT in its negotiations in the European Commission.

However, the CAA alone cannot alter EASA regulations and indeed EASA expects the industry to represent itself. Contrary to popular belief, representations made by a single national authority do not have much influence as representations made by pan-European industry groups. It is therefore essential that those regulated participate in the rulemaking process directly or through their associations. There are numerous examples of cases where the CAA and industry representations together have successfully influenced EASA rulemaking.

We agree. The CAA is committed to the principle that regulation/intervention should be proportionate to the degree of risk and the participants' acceptance of that risk. The CAA's GA Programme is founded upon this principle.

Europe - Problems

It is true that some problems and uncertainties have arisen during the transitional implementation of European Regulations.

We refer to paragraphs 22 and 23.

In addition, the CAA is committed to reviewing cases where industry identifies that the CAA has imposed more restrictive interpretations than intended by the requirement.

In some cases, the CAA has interpreted EASA regulations to give guidance to pilots. The CAA recognises that National licences originally issued with a lifetime validity have been superceded by new European legislation. Regrettably pilots will need to hold a European licence (i.e. a UK issued EASA licence) if they wish to continue to exercise their privileges and pilot. The CAA has to cover its costs and therefore does need to make a charge for the issue of each licence. The CAA cannot waive this charge as to do so would mean that other parts of industry would be covering the cost. The CAA has helped EASA and the European Commission in their work to establish a bilateral agreement for licensing between Europe and the USA. Whether so called "piggyback" licences, or other validations of UK issued licences, by other States is affected depends upon the policies and procedures of the country that issues those licences or validations.

We disagree and believe that the CAA has already interpreted the regulations in the most proportionate way, which does have its basis in safety, and made it as easy as practicable for native speakers to obtain their Level 6 requirement, which does have its basis in safety, and make it as easy as practicable for native speakers to obtain their Level 6 requirement, which does have its basis in safety, and make it as easy as practicable for native speakers to obtain their Level 6 requirement, which does have its basis in safety.
Europe - Problems 16 CAA has not done enough to explain the EASA transition to people.

The CAA has gone to some lengths to explain the transitional process to its industry. However, it is evident that we can and should do more to help industry understand the implications of the changes. As an example of where we are doing more, the CAA is planning some roadshows for November to help the current regulated training facilities understand the changes that will affect them.

The CAA is continually seeking to improve its methods of communication in order to re-engage with those who find the volume of information overwhelming.

Industry representative bodies acknowledge that UK CAA has done more than the authorities of other States to inform those affected of the impending changes. The ability to inform has been severely hampered by delays in the Rulemaking programme resulting in the final test not being made available until very shortly before they come into force. Where possible the CAA has published information in advance of the final test being made available— for example the publication of a guide on the ‘The expected effects on pilot licensing in the UK’ in September 2010 and letters to all licence holders in 2011. The CAA also gave presentations and continued to meet on the subject regularly with representatives of the industry.

We partially agree. The CAA is committed to reviewing its communication campaign in this area with a view to ensuring an appropriate balance between timeliness, accuracy and volume of information.

Europe - Problems 16 CAA has Light Sport Aircraft under EASA PtF as a Group A aircraft, leading to excessive requirements when they are meant to be regulated lightly.

Although Light Sport Aircraft are EASA type, they are granted annual EASA Permits to Fly. EASA has chosen not to apply Part-M for UK registered aircraft. The CAA has agreed with EASA that Chapter A3.7-2 of BCAI (CAP 533) is used for the continuing airworthiness and maintenance requirements, as it does for any aircraft with a National Permit to Fly. Therefore, the continuing airworthiness is managed in the most proportionate way acceptable to EASA.

We believe this to be a misunderstanding. Light Sport Aircraft operated under an EASA Permit to Fly are treated in exactly the same way as UK National Permit to Fly aircraft.

Europe - Problems 17 Introduction of aerobatic rating is unnecessary extra expense and bureaucratic to get.

As for the UK, the CAA has sought to meet as soon as possible to see if further simplification can be made.

Prior to the implementation of the EU rules, several States already had a mandatory aerobatic rating under their national legislation. These countries included the introduction of an equivalent rating into Part-FCL on the basis, as they saw it, that they were not prepared to see safety standards reduced in this area.

We agree and did not support the proposal. However, the CAA will seek to ensure that the introduction of this new rating is as simple and cost effective as possible.

Europe - Suggestions 18 Leave the EU.

This would be a political decision, but the case to do so is not clear cut as it could have a very serious economic impact on the UK’s industry. For example, the flight training schools that provide courses for professional pilot licences derive much of their income from foreign students seeking European licences that allow them to gain employment with any European airline. If our schools became national UK schools enabling pilots to obtain UK national licences, those licences would not be valid for working as a pilot within the EU.

To continue in “self” courses for European licences, schools in the UK that host the EU would have to be approved and audited by EASA directly. The instructors would have to have qualifications issued by an EU State and pilots completing courses at the schools would have to obtain their licences and medicals from an EU State Timeliness, our airlines benefit operationally and financially by being based within the EU. If the UK left the EU, it is likely that there would be significant financial incentive for our airlines to move to principal places of business to other EU States. If the UK left the EU it is likely that our own aviation community would want the UK to remain on EASA Member State. The “mutual recognition” agreements established between the UK and some other EU States to allow freedom of movement of pilots.

The CAA cannot comment. This is a political decision which is outside the sphere of the CAA’s responsibility but the CAA has identified the potential for significant disadvantage effects on UK aviation of such a change.

Europe - Suggestions 19 Take GA entirely out of EASA, see comment on item 18.

The CAA cannot comment. This is a political decision which is outside the sphere of the CAA’s responsibility.

Europe - Suggestions 20 English proficiency test should be simplified. See also items 11 and 15.

Examiners are already authorised to certify Level 6 Language Proficiency to pilots who are fluent. In a pilot is only going to fly non-radios, language proficiency is not required. However, few pilots choose to apply for a licence that is valid “non-radio” only.

No disagreement. This is adequately covered by extant regulation.

Europe - Suggestions 21 English proficiency should be grandfathered and/or assumed through previous tests in English, or on English, such as the RTFD test.

It is not clear from the comment what previous tests of English should be recognised. The ICAO language proficiency requirement is targeted specifically at the candidate’s ability to communicate clearly using language in an aviation context and there are no known internationally recognised tests that address this subject. Most English qualifications are for the written word, not speech.

Also, accent and dialect can often significantly impair understanding even between native English speakers who are from different English-speaking regions/countries. Passing the radio test does not justify non-expiring proficiency in English.

Repeat of previous: The CAA has no way of determining from a licence application whether or not the applicant is a fluent native English speaker. Country of birth, name etc are not reliable indicators in our multi-cultural society. Also, many applicants for CAA licences are foreign nationals, who may nevertheless be fluent in English. It would not be feasible for the CAA to test applicants differently depending upon nationality or accent origins, there must be evidence of proficiency. The CAA has authorised all examiners for pilot tests, including radio examiners to be able to certify that any pilot who is
Europe - Suggestions

22 The CAA should seek to take gliding out of EASA since the BGA clearly regulates well. At least move them to Annex II.

Agreed. The CAA has not identified any avenue that would allow UK gliding to be excluded from EU-regulations. However, the CAA argued for retention of the existing glider pilot certification regime and will seek to ensure that the introduction of these new training requirements is as simple and cost effective as possible.

23 Should be greater use of grandfather rights during transition.

We partially agree. The CAA has not identified any avenue that would allow UK gliding to be excluded from EU-regulations. However, the CAA argued for retention of the existing glider pilot certification regime and will seek to ensure that the introduction of these new training requirements is as simple and cost effective as possible.

24 CAA should publish more data on the pace of transition.

We have published extensive information regarding what has to be complied with and why, and would welcome suggestions of where more information and clarity could be helpful.

25 CAA should not regulate gliders flying near cloud.

We disagree. The CAA, in conjunction with the EASA, has contributed to the development of the Glider Cloud Flying Rating which will permit gliders to operate in and close to cloud without the need for an instructor being present.

26 Additional GA regulations should have clear safety rationale, not for harmonisation.

We agree. The CAA has actively engaged with EASA to ensure GA regulations are proportionate to the safety risk and that associated harmonisation aspects take account of this.

27 CAA should not seek to implement new EASA regulations before learning from others’ best practice.

We disagree. This is a misunderstanding. A guiding principle, as defined by EU Regulation is, to permit the free movements of goods, services and people within Europe.

28 Make GA circulation in and out of Europe.

We disagree. The CAA has no discretion other than to implement EU Regulation; this principle applies not only to GA and we consider the options available, and the implications for the UK industry before deciding which implementation strategy to adopt. In some cases, the overall benefits support the case for early adoption, while in others a later timetable is more suitable in all cases, it is recognised that both the regulator(s) and the industry will necessarily go through a “learning curve” and the CAA will be flexible in its regulatory approach through the early implementation phase.

29 Make a review of EASA performance.

We are unable to comment. This subject is beyond the direct remit of the CAA, however, the CAA has addressed this for participation and influence in the regulatory development process, and also to consult with industry and take maximum advantage of derogation opportunities where appropriate.

30 Owner validation should be done at minimal cost to licence holders.

We agree. While the CAA has to recover costs it is committed to ensuring that costs are minimised.

31 Make use of EASA and develop a Europe-wide certification system.

The UK has already supported the introduction of EASA and its principles of proportionate EU-wide certification.

32 Stop subsidising the CAA.

We agree and have stopped the subsidy.

Europe - Options

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The UK has already supported the introduction of EASA and its principles of proportionate EU-wide certification.

26 Stop subsidising the CAA.

We agree and have stopped the subsidy.
Fees are too high, lack transparency and have no clear rationale. £90 for name change on-aircraft ownership document.

We disagree and have a programme of change underway including introduction of customer-focused information centre and associated IT-based transaction system. In addition, the CAA has launched a new customer complaints service to ensure we address any complaints in a timely and consistent manner.

CAA is 'institutionally arrogant'. The CAA fully recognises that as a Regulator it must always act in the public interest to progress an investigation and the nature of the information required.

Ultimately the CAA must make a decision about whether it is in the best interests of those that it regulates and in a manner which fundamentally increases safety. The CAA's processes are pragmatic safety.

promoting higher safety performance. The CAA's processes are upwardly consistent (e.g. passport office).

The CAA's legal obligation, placed on it by the Government, is to cover its costs and make a return on investment. Several initiatives are being refocused to enable that objective to be executed more effectively and efficiently.

CAA is committed to the principles of risk-based intervention as evidenced in the Safety Plan. See also Items 1 & 2.

The CAA has made a legal obligation, placed on it by the Government, to consider its costs and make a return on investment. Several initiatives are being refocused to enable that objective to be executed more effectively and efficiently.

We agree and have a programme of change underway including introduction of customer-focused information centre and associated IT-based transaction system.

We disagree. The CAA are obliged as a Regulator to investigate all allegations of breaches of relevant legislation and make appropriate recommendations. However, the CAA has recognised the need to be more transparent about its enforcement action and work is already under way to ensure compliance.

The CAA's policy is to institute an allegation of breaches of the AOC that can be substantiated. The CAA has recognised the need to be more transparent about its enforcement action and work is already under way to ensure compliance.

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See comments on line 4. We agree. The CAA is committing to the principle of risk-based intervention as evidenced in the Safety Plan. See also Items 1 & 2.

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CAA does not need a medical department.

Many suggested that CAA should simplify and reduce cost.

European law requires the CAA to have the expertise and staff to approve and provide ongoing regulation of Aeromedical and medical Examiners. Also, the commercial pilot training schools, GA Associations and the airlines have all recognised the very significant successes achieved by the CAA Medical Department in influencing EASA to create medical regulations that are pragmatic and effective.

The Medical Department has four main functions: Authority Medical Services, Aviation Health Unit, Aeromedical Centre and Occupational Health Department. The Authority Medical Section undertakes the core medical assessments of primarily commercial pilots and ATCOs who have developed serious medical conditions. This is a statutory function under ICAO and EASA regulations with the aim of ensuring the fitness of pilots/ATCOs to operate/controll.
The Aviation Health Unit has a statutory responsibility to safeguard persons on board aircraft. The Aeromedical Centre is a self-funding medical clinic that enables licence holders to access specialists expeditiously to ensure return to flying/controlling after illness and to ensure their health is maintained. It also provides a service for initial Class 1 applicants, who will fund their initial medical assessments; it is not a burden on industry.

The Occupational Health Department maximises the fitness and hence productivity of CAA staff.

The CAA has initiated a Strategic Review, conducted by a team of external specialists, of the Medical Department. The review is being undertaken throughout September and October, with a final report due to be presented in mid-November. The CAA will take this report, any recommendations, fully into account in developing options that ensure the CAA most effectively meets its regulatory obligations, and minimises the cost and burden of its medical regulation.

CAA does not need to make RA2.

Cessna has already been benchmarked against industry equivalents. Moving the office location is not thought to result in any significant cost reduction.

We agree. The CAA has started to introduce a customer relations management system. The CAA agrees with this suggestion and work is already underway to introduce such a procedure by the Autumn.

The CAA recognises that it must reduce cost and work is to be introduced such a procedure by the Autumn.

We partially agree. A new complaints procedure was launched in September 2013, see the following link: http://www.caa.co.uk/application.aspx?catid=14&pagetype=65&appid=7&newstype=n&mode=default&sid=2278.

We would appreciate more information.

We agree. Consideration will be given to introduce this facility where permitted by EU Regulations and where clear benefits can be gained.

In general there is only commercial urgency for commercial pilots flying with airways. This introduces the risk that temporary certificates/licences may be challenged during SAFA/Ramp checks in other countries. The perception that temporary certificates are needed may have arisen due to the recent decline in the issuance of licences that resulted from the transition to new EU regulations. Turnaround times have now returned to normal (pre-transition) and work is in progress to shorten these times further. Adding temporary certificates will add another layer of complexity which may be unnecessary if licences can be issued by the CAA more expeditiously.

We would appreciate more information.

We agree. This is for the DfT to decide.

We agree. We partially agree. Item 33 cover on-line systems for applications. However current EU and national legislation stipulates that only the CAA may issue certificates and licences. The CAA will consider with its IACAD partners investigating opportunities for centralisation of aviation records.

We agree. Work is already underway to redesign the website. This activity is taking place alongside other initiatives to introduce online transactions (applications, payments etc.).

We agree. The CAA has started to introduce an online application system. The CAA agrees with this suggestion and work is already underway to introduce such a procedure by the Autumn.

We disagree. The EASA forms, whilst meeting EASA internal needs, do not necessarily meet the needs of individual EU Member States such as UK. The CAA is in the process of both simplifying licencing licencing, and forms do not include the legal and financial aspects that need to be addressed.

We agree. The CAA recognises the need for a formal complaints procedure and work is in hand to introduce such a procedure by the Autumn.

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We agree. We agree. We agree.

We would appreciate more information.

We partially agree. While the CAA has no obligations within the Civil Aviation Act to actively promote GA, it fully recognises the importance of the sector. The CAA recognises and is committed to fulfilling its obligations to ensure that regulatory interventions are proportionate to the safety risks, and do not impede development of the sector.

We agree. We agree.

We would appreciate more information.

The CAA has started to introduce an online application system. The CAA agrees with this suggestion and work is already underway to introduce such a procedure by the Autumn.
Civil Aviation
Authority - Suggestions
64 OAP should be aware of ongoing regulatory changes. The need for more transparency in this regard for industry is acknowledged. The majority of the recent changes to regulation are European. The CAA used a variety of methods for publishing information about the changes including written information notices and at periodic meetings with industry representatives. The CAA is actively considering planning more interactive deliveries such as road shows, seminars and surgeries on a variety of topics in areas such as Part M and EASA. See GA Newsletter and EASA for General Aviation. Airworthiness for owners, engineers and approved organisations.
We agree. See item 20
Civil Aviation
Authority - Suggestions
65 CAA should perform its own internal review to identify candidates for relaxed regulations, as was successfully done with unmanned airfields.
In 2012, the CAA carried out a Regulatory Review of Non-commercial Air (R2) which identified a number of potential areas for reducing the regulatory burden. The CAA has since launched a GA Programme, to be managed by a dedicated programme manager, whose primary objective will be to implement the changes identified in the review.
We agree. The CAA has carried out a thorough review of the regulatory approach to commercial aviation and is committed to developing a programme of work, in conjunction with industry stakeholders, to reduce the regulatory burden wherever feasible. This remit also extends to managing EA and EU partners in the delivering of the EASA GA Safety Strategy. With regard to GA specifically, the CAA is establishing a dedicated GA Unit which will, as one of its objectives, the managed deregulation of the sector wherever it is agreed with industry and other key stakeholders that such derogation is appropriate.
Civil Aviation
Authority - Suggestions
66 CAA could send out email notifications when ratings etc are due to expire. The CAA is considering providing such a service as part of the development of new electronic and online systems, however, there are a considerable number of licences and ratings in existence and to send a notification for every impending expiry may be impractical.
See item 57.
The shear volumes, and delays in resolving test reports from (industry) examiners may make this impractical - i.e. too many false warnings
Civil Aviation
Authority - Suggestions
67 The CAA needs someone on their board of directors representing GA. The role of the Board is to execute corporate governance as defined within the Civil Aviation Act. Representation of specific industry sector interests at this level is not appropriate and may be inconsistent with obligations of impartiality.
We disagree. The role of the Board is to execute corporate governance as defined within the Civil Aviation Act. Representation of specific industry sector interests at this level is not appropriate and may be inconsistent with obligations of impartiality. Nevertheless, the CAA recognises that some informed challenge of its GA regulation would be healthy and, as part of the work to introduce a new GA Unit for the regulation of GA, will also work with the Government to establish a GA Challenge Board comprising representatives from the GA sector.
General
Problems
68 The sector needs a period of regulatory stability with less external influences. The European General Aviation Safety Strategy will address the ongoing need for stakeholders of need of stakeholders, but does not recognise the need to extend existing regulatory stability in order to reduce the current period of uncertainty and turmoil. This will be a significant further change, but not one from the GA community.
We agree. It is expected that changes due to the introduction of the EASA Regulations will stabilise in the near future but there will be an inevitable period of minor adjustment. The CAA is committed to participate in the development of the EASA GA Safety Strategy which is expected to bring about further positive changes in the EASA GA Regulations in due course.
General
Problems
69 Change such to GA regulations is confusing and has not been adequately explained. See also item 6.
See also item 6.
General
Problems
70 The CAA has not aligned the certification of GA, EASA and FAA adds to the complexity of the previous rather than replacing, meaning that there is a complex series of overlaps. The CAA recognises the way in which certification standards and specifications have developed since 2005 and have acknowledged. The majority of the recent changes to regulation acknowledge. The majority of the recent changes to regulation are European. The CAA is committed to continually reviewing the Airworthiness regulatory framework, which has already been implemented for some time, is designed and constructed so that in set each tier complements and links in without introducing additional burdens. Examples of this are found throughout the requirements for organisational approaches as the UK national framework generally is designed to easily 'bolt-on' to an EASA approach, thereby reducing the complexity and administrative burden to organisations that seek to meet EASA. The CAA is committed to continually reviewing the Airworthiness regulatory framework, which has already been implemented for some time, is designed and constructed so that in set each tier complements and links in without introducing additional burdens. Examples of this are found throughout the requirements for organisational approaches as the UK national framework generally is designed to easily 'bolt-on' to an EASA approach, thereby reducing the complexity and administrative burden to organisations that seek to meet EASA.
We disagree. Representation of GA operators is determined across different aspects of the regulation where applicable. The Annex II regime remains a national responsibility and is complementary to equivalent EASA regulation.
The CAA will consolidate the rules where this can be done without disadvantage to those regulated.
General
Problems
71 There should be greater certification on the impact of wind farms. The CAA is responsible for ensuring that the safeguarding of licensed aerodromes is carried out by the operator. The CAA also publishes advice and guidance in respect of aerodrome development to support the needs of developers, stakeholders and local planning authorities.
We believe this is a misunderstanding. The CAA will continue to provide impartial guidance, however its remit does not extend to the coordination of the impact of wind farms.
General
Problems
72 Increasing polarisation of users to GA between Fy and C of A. Leading to a dual system of light sport aircraft and bigger aircraft with rating in between. This is due to regulation. The CAA recognises the need for a restricted Type Certificate and restricted Certificates of Airworthiness for aircraft that do not meet EASA requirements for organisational approval. Transitional plans are evolving to determine how some light sport aircraft (LSA) may move to a restricted Certificate of Airworthiness from a permanent EASA Permit to Fly. The CAA has since launched a GA Programme, to be managed by a dedicated programme manager, whose primary objective will be to implement the changes identified in the review.
We disagree. The CAA recognises the need for a restricted Type Certificate and restricted Certificates of Airworthiness for aircraft that do not meet EASA requirements for organisational approval. Transitional plans are evolving to determine how some light sport aircraft (LSA) may move to a restricted Certificate of Airworthiness from a permanent EASA Permit to Fly.
General
Problems
73 Returned licences for AOA licences and EASA licences.深圳市3. The European Commission is working with officials in the US to in EU airspace achieve European or equivalent safety standards. The CAA is very supportive of the regulated community taking a lead in initiatives such as the regulated community taking a lead in initiatives such as the EU airworthiness programme for small aircraft.
We believe this is a misunderstanding. The CAA will continue to provide impartial guidance, however its remit does not extend to the coordination of the impact of wind farms.
General
Problems
74 Risks for GA in the commercial world. The CAA has been subject to a review of recreational aviation identified in the review.
We believe this is a misunderstanding. The CAA will continue to provide impartial guidance, however its remit does not extend to the coordination of the impact of wind farms.
General
Problems
75 GA database is to be digitised - commercial work. The suggestion was in a review of recreational aviation identified in the review. The CAA’s GA programme aims to tackle this.
We believe this is a misunderstanding. Commercial operation within the GA sector is adequately covered by existing regulation, however we recognise that opportunities may exist within certain GA sectors to review commercial operation and we are engaged with EASA and our EU colleagues in this area.
General
Problems
76 Introduce proportionality test on new regulations. The CAA and EASA are seeking to address this suggestion and add proportionality considerations to the existing cost/benefit impact analysis.
We believe this is a misunderstanding. The CAA and EASA are required to apply principles which include proportionality and regulatory impact elements during the regulatory development process including public consultation. The new CAA GA Unit will ensure that all new requirements and policy is proportionate to the safety risks and does not add undue regulatory burden to the GA sector.
General
Problems
77 Operators who have passed CAA assessment exams, training, examiner etc should be trained more and not charged for everything they do. See also item 6. Where necessary, the CAA uses a risk-based approach for licensing the CAA is moving more towards monitoring and sampling and risk-based auditing.
We believe this is a misunderstanding. Licensing privileges are not predicated on a chargeable basis during the validity of that licence. We would welcome further dialogue on this matter to better understand its foundation.
General
Problems
78 General aviation operators and small independent flying schools have already developed such schemes and the CAA supports this approach. In keeping with EASA policy on safety, the CAA believes that flexibility and risk-based approach should be applied. We agree. The CAA fully recognises the safety benefits of meeting and maintaining necessary levels of competency and will commit to integrating opportunities to achieve these in its forward-thinking and risk-based approach.
The CAA is very supportive of the regulated community taking a lead in initiatives such as this.
General
Problems
79 No minimum duration for flight licences for aircraft each year. The European General Aviation Safety Strategy will address the ongoing need for stakeholders, but does not recognise the need to extend existing regulatory stability in order to reduce the current period of uncertainty and turmoil. This will be a significant further change, but not one from the GA community.
We agree. It is expected that changes due to the introduction of the EASA Regulations will stabilise in the near future but there will be an inevitable period of minor adjustment. The CAA is committed to participate in the development of the EASA GA Safety Strategy which is expected to bring about further positive changes in the EASA GA Regulations in due course.
General Suggestions
60 The system for submitting flight plans should be simpler and more flexible.

The CAA acknowledges this is a critical supportive of the work of independent software companies which, with the encouragement of stakeholders such as NATS, have already started producing systems that are well-regarded by GA pilots.

We agree. The CAA will continue to support the work of industry and the IDG to develop and deploy improved Flight Plan System procedures.

General Suggestions
61 CAA and EASA should disengage from small aircraft (less than 2,000kg). Leave the pilots and engineers then to the LAA manage things.

For aircraft that fall into the UK National Requirements Category 'Annex II', the vast majority have oversight and airworthiness support provided by the LAA and BMAA. Those aircraft which don't are supported by other CAA approved maintenance and inspection organisations. We agree that the LAA and BMAA. This recommendation was identified in the RA2 study and will be addressed by the CAA, as part of the LAA programme.

We agree. The CAA has granted approvals to the BGA to perform activities commensurate with its capabilities to the full extent as allowed by the EASA requirements. This includes establishing the BGA as a GA-ATC and an ATO.

Maintenance Problems
59 We agree. CAA internal engineering inspectors sometimes use too much insufficiency and experience.

A rotation of surveyors allocated to regulated companies is promoted within the regional offices. CAA is concerned that the number of surveyors are inadequate, amongst other things, at the cost of compliance. We agree. A review of the scheme of charges will be conducted after introduction by EASA of more proportional requirements. This will likely be in 2014/15.

Maintenance Problems
60 We agree. CAA fees increase yearly costs are lower and lower quality.

CAA fees are annually reviewed and subject to public consultation. A system of auditing at a frequency dependent on the extent and complexity of the organisation is being introduced. We agree. This recommendation was identified in the RA2 study and will be addressed by the CAA as part of the LAA programme.

We agree. The CAA is investigating the organisation of its fee system to ensure that it is appropriate to the regulatory regime.

Maintenance Problems
61 Part M is too bureaucratic and offers too little flexibility. Requirements designed people where MI needed one, increase paper work, not safety. The need to list every type for Part M is excessive and adding more costs a lot.

We agree. The CAA is working to ease the approval process to assist greater take-up of EASA capable hand-held radios.

Maintenance Problems
62 Part M introduces regular fees for each approval type, but the planes are simple and have very few different, so fees are just admin taxes.

We agree. The CAA is working to ease the approval process to assist greater take-up of EASA capable hand-held radios.

Maintenance Problems
63 Proposals to charge for radio-frequency (RFS) monitoring are not seen as necessary.

We are not able to unilaterally avoid implementation of ESSA fixed monitoring.

We agree. A review of the scheme of charges will be conducted after introduction by EASA of more proportional requirements. This will likely be in 2014/15.

General Suggestions
16 CAA and EASA should disengage from small aircraft (less than 2,000kg). Leave the pilots and engineers then to the LAA manage things.

The CAA should delegate as much of the workload of EASA to the BMAA as possible.

We agree. The CAA has granted approvals to the BGA to perform activities commensurate with its capabilities to the full extent as allowed by the EASA requirements. This includes establishing the BGA as a GA-ATC and an ATO. The CAA recognises that the current system for recording the capabilities of organisations working in the recreational aviation sector, such as the LAA and BMAA. It is hoped these new requirements, once embedded, will allow a greater degree of autonomy to organisations holding this approval. We agree. A review of the scheme of charges will be conducted after introduction by EASA of more proportional requirements. This will likely be in 2014/15.

General Suggestions
16 CAA and EASA should disengage from small aircraft (less than 2,000kg). Leave the pilots and engineers then to the LAA manage things.

The CAA has keen to disengage from the aviation security and this is consistently reviewed by the CAA. There is a need for organisations to ensure that they meet the requirements set by NACs. The CAA is eager to other bodies wishing to take on the leading role in developing solutions that are able to demonstrate the regulatory requirements.

We agree. The CAA is receptive to other bodies wishing to take on the leading role in developing solutions that are able to demonstrate the regulatory requirements.

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We agree. The CAA is receptive to other bodies wishing to take on the leading role in developing solutions that are able to demonstrate the regulatory requirements.
The process to get an EASA PtF

EASA is happy for certain maintenance problems to be replaced according to manufacturer's guidelines, but CAA won't allow it. The massive cost differential can be difficult to find licensed personnel willing to take things on.

The topic is subject to review by the CAA GA Task Force for organisations involved in continuing airworthiness management and maintenance.

We agree. The CAA is Influencing and commenting on EASA GA Task Force proposals to seek an understanding of recently introduced system.

103 The change from an expiring UK CofA to an EASA style non-expiring CoC with a National Airworthiness Review Certificate (NARC) was made following a request from industry for the national system to be similar to the CASA system. Although the new certificates are different from the old UK CofA, for GA aircraft, the process of renewing the NARC introduces no additional burdens when compared to the old process. The introduction of the new organisation approvals (AB-23, AB-24 and AB-25) are intended to reduce the burden on industry where they maintain both EASA and non-EASA types by harmonising the procedures used to underwrite the airworthiness review processes.

No further action required.

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No further action required.
The requirement for microlight aircraft to comply with noise level requirements that are not applied to other aircraft makes no sense in an environmental or other terms. The use of 2-stroke engines not for aviation use resulted in the unacceptable noise nuisance and inadequate safety levels which led to the Government’s decision to direct the CAA to regulate them. Increased use of four stroke engines makes this less relevant, but the fact that microlights have a noise certificate is often of use in ensuring planning authorities are aware of the aerodrome by microlights. The CAA supports the removal of environmental noise testing for microlights on the basis that modern engine/propeller installations are significantly quieter than installations in existence at the time the requirements were originally introduced.

Many called for a way of adequately onshoring aircraft, or some way of moving to PtF from CoA. The CAA has a process in place for allowing EASA compliant aircraft operating on a Certificate of Airworthiness to be temporarily labelled as a Type Certificate (TC) holder or Type Responsibility Agreement (TRA) holder no longer active. This process has been used to allow many aircraft owners to have the choice of allowing a COA or the TRA.

The UK LAMP (Light Aircraft Maintenance Programme) was introduced to meet the requirements of a generic programme as described in Part M. Although widely used, its use and approval was questioned by EASA during a Standardisation Audit. As a result of a feedback, the CAA is required to replace LAMP, this has been delayed while the GA Task Force established by EASA in early 2012, review Part M and is particular the maintenance programme requirements for GA aircraft. The proposals published last year (NPA 2012-17) include a minimum inspection programme, similar to the US LAMP.

Profit is now a major reason of global industry with global competition. Maintenance organisations approved in accordance with the EASA regulations have access to global market as many states recognise these European standards. There are also new bilateral agreements with the United States and Canada which when fully implemented will enhance UK access to the world’s largest aviation markets. These agreements already benefit the UK market in enabling maintenance to be performed to non-UK registered aircraft.

An aircraft from other EASA states should not need to go through a UK approval process. Aircraft subject to EASA regulations are accepted onto the UK register without the requirement to go through any approval process. There are no restrictions to British engineers working on non-UK registered aircraft if this is acceptable to the state of registry. Furthermore, when the Engineer is licensed under Part 46, they can freely work on any aircraft (within their license privileges) on any EASA member state register.

Once approved CAMOs should be able to develop their own maintenance regimes without further CAA approval. Should allow them to exercise judgement on when to replace parts. The EASA regulations allow for CAMO’s to hold a privilege in accordance with Part M ref. M.A.302(c), to approve maintenance programmes. The possibility exists for the CAMO to develop alternative instructions (ref. M.A.302(b)). EASA have also recognised this difficulty and have proposed more liberal and simplified requirements as contained within the recent Notice of Proposed Amendment (NPA) 2012-17.

Rather than seek approvals by type, CAMOs should be able to get them by broader category (e.g. SIF below 5 ft). The CAA recognises that the current system for recording the capabilities of the organisation needs to be reviewed. The GA Task Force is reviewing the way in which organisation type capability is described.

Would be a better way for pilots to self maintain if they can demonstrate competence. EASA regulations do allow for pilot owner maintenance. The ideal can be found in Appendix VIII to Part M (Commission Regulation (EC) no 3962/2000). The concept of the pilot owner maintenance is based on the competence of the individual and a task based. Details of the National requirements for pilot owner maintenance on Annex II aircraft can be found in the Air Navigation Order, Section 3, Part 6, paragraph 12. It also remains acceptable for private owners to work on their own aircraft under the supervision of a licensed engineer.

Reduce restrictions on LAMEs being freelance. There are no restrictions to Licensed Engineers operating in a freelance capacity. However, there are conditions applied such as within Part M, M.A.301(b). For privately operated GA aircraft it provides a substantial scope for a freelance certifying engineer to perform many maintenance activities. It is only limited where complex tasks are necessary and where extensive equipment and facilities would be required to perform the task. There are also further obligations for aircraft below 1200lbs (544 kg).

Reduce the requirement for a full overhaul of engines in light aircraft used for commercial hire and reward. Industry updated Generic Requirement 1 permits under controlled conditions the extension of certain light aircraft piston engine overhaul lives and above the recommendations of the engine manufacturers. Such extensions are limited to a maximum of 120% for engines installed on aircraft used for commercial hire and reward. EASA is considering changes to the requirements for non-binding “Time Between Overhaul” (TBO) and are looking to publish their decision before the end of 2013.

Reduce maintenance regime on plane’s purpose (private/commercial), not ordinary CAMO/PV detection. Maintenance regime do differ for aircraft that are used for commercial purposes to those used for private use only. Maintenance programmes are customised depending on the envisaged operation. However, the specific maintenance requirements are established by the aircraft manufacturer during the development of the product. Therefore the basic maintenance needs of the aircraft do not change as a result of the operation on a Certificate of Airworthiness or Permit to Fly.
There should be a centralised training organisation to take on more of the regulatory tasks (e.g. through SMS). The CAA has developed a streamlined approach that will help the current registered training organisations to convert to approved training organisation status by April 2015. This process will minimise both the cost and the regulatory burden. The CAA has issued an Information Notice that introduces a new policy. This policy allows the handling of national authorities in different states to be harmonised. The CAA has also issued a consultation paper for flight simulators, despite them being in wide use all over the world so it is rational to have 9 Papers. The CAA has finally issued a manual that can be used as a training aid to gain support to do so from other countries, as they seem to interpret the regulations differently.

The CAA has developed a consultation paper that sets out a mandatory minimum flight time for IR courses, so that the examiner can be trained to fly on those instruments alone. The CAA has also developed a consultation paper that sets out a mandatory minimum flight time for IR courses.

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A regulation says that an ATO must have access to suitable aircraft. CAA takes this to mean owned or leased, so cannot be shared among a group of pilots unless each pilot holds their own license. From the licensing perspective, the ATO may use any aircraft suitable for the purpose regardless of who owns it. The problem being cited here relates to the airworthiness restrictions in a permit to fly that limit the circumstances where payment may be made to use the aircraft.

The CAA agrees and acceptable and proportionate standards are being developed in consultation with stakeholders. It is recognised that for “non-complex” organisations, the standard CAA exam will be suitable, but for “complex” organisations a similar approach may be required.

The CAA has already committed to amend the requirement to address this. The CAA has already taken steps to improve the quality control of exam papers and is now implementing the position in the meantime to see if the requirement can be delayed for RIs.

The CAA disagrees and the ATO will have to make arrangements to comply with the requirement when it comes into force for all RIIs after the agreed date by April 2015.

The CAA would welcome more information on this issue to understand the particular issue and possibly seek industry feedback on the requirements.

A fixed-wing instructor can’t examine an autogyro student in exams, even though the papers are exactly the same. CAA takes this to mean that an autogyro examiner can’t examine any aircraft that the examiner can’t conduct a pre-flight examination on. To allow the general papers to be conducted by an Examiner (test instructor) would mean involving 2 examiners. It is less complex to require all examiners to use a gyroplane examiner.

The CAA agrees and has already committed to amend the requirement to address this. The CAA has already taken steps to improve the quality control of exam papers and is now implementing the position in the meantime to see if the requirement can be delayed for RIs.

The CAA disagrees and acceptable and proportionate standards are being developed in consultation with stakeholders. It is recognised that for “non-complex” organisations, the standard CAA exam will be suitable, but for “complex” organisations a similar approach may be required.

The CAA agrees. The CAA will continue to seek to influence the EASA rulemaking programme to develop competency-based rules.

The CAA disagrees and the ATO will have to make arrangements to comply with the requirement when it comes into force for all RIIs after the agreed date by April 2015.

There is no quality control on the exam questions as sometimes they are impossible to grade. There has been no evidence that exam questions are not being conducted by an experienced examiner to the standard required.

The CAA has been, and remains receptive to proposals that include appropriate compensating measures so that the position regarding extra time could be changed with the agreement of EASA and the Commission. However, to date no such compensating measures have been identified and submitted to the CAA.

The CAA will investigate this as part of its commitment to improve the quality of flight exam papers. The CAA will also be moving to introduce on-line exams.

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The CAA would welcome dialogue with FFTP operators to see whether a safety case can be made for a more proportionate regulatory oversight regime for FFTP’s which could then be discussed with EASA.

Some of the Papers for gyroplanes are the same as for other aircraft, but some are specific to gyroplanes and must be conducted by a gyroplane examiner. To allow the general Papers to be conducted by an Examiner (test instructor) would mean involving 2 examiners. It is less complex to require all examiners to use a gyroplane examiner.

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This suggestion is already being implemented by the CAA. The manual is being circulated to some stakeholders for comment before publication to assist industry in the Finance Advisory Committee, which includes representatives from the GA sector.

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The EU rules are derived directly from the JAR-FCL rules that were identified.

This will not be required when the RIIs become Approved Training Organisations under European rules. As approved organisations, the ATOs will have procedures in place for selecting appropriate aircraft and will be accountable for those selections. The CAA will review the position in the meantime to see if the requirement can be delayed for RIs.

This suggestion is already being implemented by the CAA. The manual is being circulated to some stakeholders for comment before publication to assist industry in the Finance Advisory Committee, which includes representatives from the GA sector.

The CAA disagrees. The CAA will investigate this as part of its commitment to improve the quality of flight exam papers. The CAA will also be moving to introduce on-line exams.

This is not a misunderstanding. If this is not a misunderstanding there may be a problem with the examiner’s individual case. The CAA would welcome more information on this issue to understand the particular issue and possibly seek industry feedback on the requirements.

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Training - Suggestions
153 Make GA aircraft to be used for training, subject to appropriate mechanical checks. This is permitted under the licensing rules.

Training - Suggestions
154 Some suggested that the government make loans to help with CPL training. This is a matter for the DfT to respond to.

Training - Suggestions
155 Hours spent training for IR should count towards IR. This has been confirmed since the AIP Navigation Order was changed in April 2010.

Training - Suggestions
156 Training at all non-licensed fields. This is a matter for the DfT to respond to.

Training - Suggestions
157 No VAT on flight training. This is a matter for the DfT to respond to.

Training - Suggestions
158 There is confusion around validity of LAPL for microlights and a CAA statement would help here.

Training - Suggestions
159 Remove the requirement for classroom training.

Training - Suggestions
160 Examinations should be allowed to test their own pupils – trust their integrity.

Government Departments / Businesses / Other - Problems
161 Flexes parked in hangar are deemed to be "handled" by hangar owner, meaning VAT makes unremovable requests and demands from owner.

Government Departments / Businesses / Other - Problems
162 Staff have bad attitude to the CAA. This is not a matter for the CAA.

Government Departments / Businesses / Other - Problems
163 Big airports are unfriendly to GA. The CAA recognises this as an issue for GA.

Government Departments / Businesses / Other - Problems
164 DGCA are introducing new higher charges for ground stations on operating frequencies. This will discourage radio use and reduce safety.

Government Departments / Businesses / Other - Problems
165 Eurocontrol blocks proprietary mapping systems from linking to background safety data in NOTAMs. This is not a matter for the CAA.

Government Departments / Businesses / Other - Problems
166 Remove the requirement for self forms or at least greatly simplify them.

Government Departments / Businesses / Other - Problems
167 Greater consideration should be made of the effect wind farms have on safety. The CAA recognises this as an issue for GA.

Government Departments / Businesses / Other - Problems
168 No VAT on night training or aviation fuel (when training). This is not a matter for the CAA.

Government Departments / Businesses / Other - Problems
169 Square proposals for border force to charge for its services. This has been rejected by the Government.

Innovation - Problems
170 CAA does not allow ethanol in engines in Group A aircraft, even though it would allow 5% in some engine if it were in a motorcar (and ethanol is approved by the engine manufacturer up to 10%). The CAA recognises that there are problems with ethanol in MOGAS that can affect operations of the aircraft, which may need an engine stoppage. Engine fuel on a microlight is not expected to have as serious consequences as on larger aircraft due to the lower kinetic energy. The CAA has a process for approval of engine/aeroplane combinations for the use of MOGAS containing ethanol, and encourages the GA community to provide data that would enable more aircraft to be qualified to use the fuel. When considering the qualification of an aircraft to use fuel containing ethanol the suitability of both the engine and its fuel system must be determined. For some aircraft this will require certain elements of the fuel system to be modified to ensure safe operation. There are now viable alternatives to MOGAS that are widely available and approved for use such as US 91. CAA publication CAP 740 general consensus 7 contains information on the use of US 91.

Innovation - Problems
171 CAA won't allow addition of things like silencers without expensive approval. No further action is proposed. The comment appears to have been based upon a misunderstanding as explained in comment response.
Innovation - Problems

178 Allow the LAA to licence small aircraft. This would encourage innovation. Certification should be easier.


176 Reduce restrictions on modifying certified aircraft. Some suggest the FAA model.

175 Allow FRTOL holders to use all equipment except that which would meet the FAA requirements. This would encourage innovation.

174 One of the aspects of the CAA's recent review of recreational aviation was to explore the possibility of introducing a new BCAR/Chapter A8-26 for microlights. The CAA is currently reviewing developments with the single-engine category of aircraft and has identified an experimental class of aircraft to allow provision for experimental products/avionics to foster innovation. Certification should be based on a case-by-case basis pending any general rule and policy development.

173 The CAA has in the past hosted collaborative discussions to encourage product innovation such as the design of a light weight transponder. It may be that further such activities are considered as an element of our ongoing strategy with regard to UK General Aviation.

172 Innovation is hampered by bureaucracy. The CAA would welcome more information on this issue to understand the particular issue.

171 The CAA would like to see a more streamlined regulatory process.

170 The CAA has already permitted this for one aircraft and will review further applications on a case-by-case basis pending any general rule and policy development.

Innovation - Suggestions

182 Government/CAA would launch competition to design new solutions for GA avionics.

181 Create an experimental class like the FAA has.

180 The CAA agrees and is already moving towards on-line interaction with stakeholders as part of its PR programme (see earlier comments above).

179 Allow permit aircraft to fly instrument conditions if equipped. This is planned in 2013, with results to be published in 2014.

178 The CAA has in the past hosted collaborative discussions to encourage product innovation such as the design of a light weight transponder. It may be that further such activities are considered as an element of our ongoing strategy with regard to UK General Aviation.

177 The CAA does not propose to simplify existing specifications and have the manufacturers confirm that it meets them. ESA has recently issued a standard that could enable many straightforward modifications to be accomplished without the involvement of a design organisation or CEPA. The CAA also intends to adopt similar arrangements for aircraft subject to national regulation. In many areas of certification, the CAA and CEPA do simply stipulate the specifications for manufacturers to declare compliance and conformity accordingly. However, we then also agree with the manufacturer the 'Levels Of Involvement' (LOI) of the regulator. It is this level of involvement that we are reviewing so our oversight is proportionate and appropriate to the level of risk.

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Thanks to EASA, people are previously renewing SEP rating. Ireland is now bound by EU Regulations. Therefore any aircraft recognized by EASA will be recognized throughout the EU, including Ireland and the UK. No further action.

There are no licence renewals anymore. When current licences are replaced, the new licence (national or EASA) will be non-expiring.

The regulations already satisfy this comment.

We have already negotiated greater flexibility than that obtained by any other Member State. Arrangements are already in place and have been published in CAP 804 on the CAA website.

No further action.

The CAA has given more responsibility to Class 2 AMEs for Class 2 fitness decision making with the introduction of the EASA medical requirements. We have already negotiated the most flexibility available.

We have already negotiated greater flexibility than that obtained by any other Member State. Arrangements are already in place and have been published in CAP 804 on the CAA website.

We have already negotiated greater flexibility than that obtained by any other Member State. The CAA agrees and is currently working to influence the outcome of European discussions.

The credits for military pilots have been agreed between the CAA and the MoD and have been submitted to EASA as the regulations require. These terms are published in CAP 804. We believe this to be a misunderstanding. More information would be welcome.

No further action.

The CAA recognises this and the matter will be fixed as part of the new branding of system.

We have already negotiated greater flexibility than that obtained by any other Member State.

The LAPL requirements have been designed to be the least bureaucratic and as simple as possible for GPs given the authorities, EASA-LAPL medical requirements which have been published.

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No further action.

We are looking at developing the electronic publication further to compile related information into a searchable database. We are looking at developing the electronic publication further to compile related information into a searchable database. This is a quirk of our old IT system. It would be unduly expensive to correct.

We believe this to be a misunderstanding. More information would be welcome.

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The CAA recognises the issues here and is working to ensure the relevant forms are revised and simplified.

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Plates - Problems

208 Current licensing system requires some rotary pilots to have both EASA and national licenses. There is an unfortunately unavoidable as helicopter base type ratings and Annex 5 type ratings cannot be added to a Part-FCL licence. However, any pilot who holds a Part-FCL licence and qualifies for a part 603 rating will be provided with an equivalent national licence including that rating. The Part-MED medical certificate will be valid for both licences.

209 Medical requirements for gliders are excessive. The LAPL medical is now required for an LAPL(L). The holder of the LAPL medical can use it to support a LAP(L)A, LAP(L), and LAP(U). It can also be used for any UK NPPL. This is already a product of the EU legislation. However, we give full credit for the European licence in order to issue the national licence, so that it is only the training specific to the helicopter type that is required.

210 It is unreasonable that America’s helicopter require a Class I medical, not a declaration. The FAA now requires a new FAA part 603 medical for a valid part 603 medical. It is separated from FAA medical standard is below Class I. The holder of a LAPL(H) may apply to the FAA for an NPPL that can contain Annex II requirements. For the NPPL the pilot must hold a LAPL medical (or Class 1 or 2) - but a medical declaration is not acceptable.

211 The CAA has successfully negotiated that any pilot who qualifies for an RAF Medical to fly an IR(R) can be able to get further ratings. The United States has a Class II (below Class I) medical. The EASA medical is already a product of the previous JAR-FCL regulations. The CAA has already negotiated greater flexibility than that obtained by any other Member State.

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214 Include all endorsements on one LAPL with one medical to reduce cost and documentation. The CAA has already negotiated greater flexibility than that obtained by any other Member State. The United States has a Class II (below Class I) medical. The EASA medical is already a product of the previous JAR-FCL regulations. The CAA has already negotiated greater flexibility than that obtained by any other Member State.

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218 Allow anyone with RTID to operate AGC station without further papers. The CAA has already negotiated greater flexibility than that obtained by any other Member State. The United States has a Class II (below Class I) medical. The EASA medical is already a product of the previous JAR-FCL regulations. The CAA has already negotiated greater flexibility than that obtained by any other Member State.

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Plots - Suggestions
223 Should pilots have to provide a form of self-certification? This is no longer pertinent.

Plots - Suggestions
224 Allow medical certification to be up to 46/70. The EASA medical requirements have been agreed across Europe and the UK medical declaration system is well established and proportionate. The regulations already allow the option requested.

Plots - Suggestions
225 Stop charging for licence renewals. If there are to be renewals, no need for GA involvement - simply have examiner sign off. All renewal licences are notified, non-negotiable, the rules already allow examiners to sign licences to renew or revalidate ratings. This is no longer pertinent.

Plots - Suggestions
226 Remove Class Operating Area on civil airspace - so that some money can change hands provided that passenger is aware of the legal situation. The subject will be reviewed in the CAA-GA Programme.

Plots - Suggestions
227 Remove the Class (medical) requirement for pilots over 65 to have a stress ECG. Pilots over 65 are not allowed to conduct commercial air transport flight. If a pilot only flies privately a Class 1 medical is not required. Pilots over the age of 65 can undertake aerial work, for example flight instruction. With increasing age there is an increasing risk of cardiac disease and the stress ECG is one method of ascertaining whether these pilots have any indication of coronary artery disease. This is all enshrined in European Law and the international convention on civil aviation (Chicago Convention).

Plots - Suggestions
228 Remove the £20 fee to update GA licences (coding changes etc.). Increase space so that it needs reviewed less. The space has been increased. The £20 reflects the cost to the CAA of reviewing the licence, and is a government policy that the user pays. Change already made.

Plots - Suggestions
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Airspace - Problems
230 Why do England and Wales have a requirement for pilots operating below FL100 and outside Controlled Airspace to have a requirement for the installation of Transponders over 10,000ft? The transponder requirement is the same across the UK albeit that there is an exemption for those pilots under 10,000ft. The visibility and distance from cloud minima is an international standard to which the UK is obliged to implement and will also apply in the Standardised European Rules of the Air.

Airspace - Problems
231 Why does a PPL(M) need an SPAR on Class G? CAA of reprinting the licence, and it is government policy that the user pays. This will depend upon the public consultation on proposals for rule changes to address the accident report recommendations regarding differences training.

Airspace - Problems
232 Why does a PPL(M) need to remain 1000ft above cloud minima when flying at 2700ft? The regulations already allow the option requested.

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Airspace - Problems

254 Glasgow Class D was designed to protect a new runway operation but second runway was decommissioned.

The Glasgow CTR was originally established to the operation of a second runway. An approval requirement of the Glasgow ACP was that they should review their current CTR shape, this is under way. Currently under review as part of routine business.

Airspace - Problems

254 Transponder mandatory zones are not helpful.

The supporting rationale for this statement is not clear. The CAA sees Transponder Mandatory Zones as a useful and graduated response to airspace issues by creating a 'recognised' traffic environment in an area of airspace without resorting to the establishment of Controlled Airspace. They have value in enabling transponder-based safety nets (TCAS, Short-Term Conflict Alert) to function in areas of particular sensitivity, such as complex or busy airspace.

Airspace - Problems

254 Radio failure procedures under IFR are too complex.

DGAP have recently reviewed the RCP procedures to clarify some issues of the actions to be taken by both Pilots and Air Traffic Controllers. The UK RCP procedures are based on the ICAO RCP standards and our ability to differ from these is limited.

Airspace - Problems

254 Radio phonology is too complicated. Answer to internationally agreed standards.

UK phonology is in line with international standards.

Airspace - Problems

254 UK ATS has successfully absorbed itself of all responsibility.

No response.

Airspace - Suggestions

254 Where airport usage figures no longer justify their amount of CAD, this should be reassessed.

The retention of Controlled Airspace is based on several factors; the usage figures for the airfield are an important factor, as is the operating context within which the airfield is situated and the nature of the operation being undertaken. All these factors are used to inform DGAP’s decision making process.

Airspace - Suggestions

254 The regulation on flying within 50 ft of the ground when landing or taking off should apply to all airports, not just government or licensed airfields.

The CAA is engaged with Liverpool ATC, Manchester ATC and a GA (ANSP) servicing the airspace within which they lie, not just NATS. DAP encourage dialogue between the CAA, government or licensed airfields and all ANSPs.

Airspace - Problems

254 CAS(T) is too complicated. Answer to internationally agreed standards.

CAS(T) is only employed in exceptional response to temporary airspace requirements. CAS(T) is only employed in exceptional circumstances and it performs an essential role in ensuring that a temporary operation (no longer than 90 days), when justified, is safely managed.

Airspace - Problems

254 Clearer regulation of operating hours of MATZ would help.

The CAA does not regulate the operation of MATZ.

Airspace - Problems

254 Make most of the country class E up to 11000 and D and C up to 5000.

This would require all the Class E to be serviced to support the IFR operations therein and currently the infrastructure and resources are not available.

Airspace - Problems

254 Remove CAST (temporary controlled airspace) as it's a safety benefit and is presumably a security risk by publicising routes.

The CAA considers that, as seen during the Olympics, CAST can be an appropriate response to temporary airspace requirements. CAST is only employed in exceptional circumstances and it performs an essential role in ensuring that a temporary operation (no longer than 90 days), when justified, is safely managed.

Airspace - Suggestions

254 fitted airspace should take account of the small size of light aircraft and their proportionately smaller risk.

There is insufficient information available to respond to this challenge.

Airspace - Suggestions

254 Class A staff should be allowed either SVFR or IFR with an IVC rating, or else airspace below 10,000 should be considered as candidates for reclassification to a lower class.

The ICAO airspace classifications are applied in the UK FIRs in accordance with ICAO Annex 14, and in due course Standardised European Rules of the Air. SVFR is only possible in Control Zones.

Airspace - Suggestions

254 NATS should design VFR corridors to ensure sufficient vertical and horizontal separation.

VFR corridors are largely the responsibility of each of the Air Navigation Service Providers (ANSP) servicing the airspace within which they lie, not just NATS. DGAP encourage dialogue between ANSPs and users to facilitate the best possible design solutions.

Airspace - Suggestions

254 Remove the Manchester LLC, the Baldock-Ware corridor, the RTuring VOR corner, the Class D corridor between Glasgow and Edinburgh, the Gosport/Bournemouth area and the East Midlands/Birmingham corridor.

The CAA is engaged with Liverpool ATC, Manchester ATC and a GA representative body to look for possible revisions to the Manchester LLC.

Airspace - Suggestions

254 A fundamental review of UK airspace is called for.

The CAA’s Future Airspace Strategy will review the UK’s future aviation requirements.

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The CAA’s Future Airspace Strategy will review the UK’s future aviation requirements.
The CAA is aware of an airport that for a short period did promote words that suggested such a change may apply. The CAA raised the issue with the airport and a correction to their wording has been made.

Arnprior - Suggestions 261

No charging for transits should be implemented and IFR approach fees should either be abolished or else reduced to an acceptable level.

The CAA believes this issue has been addressed at the Airport concerned.

Arnprior - Suggestions 262

Arnprior boundaries should be less arbitrary and easier to understand by e.g. following bedmats.

This proposal will be examined by the Arnprior and Safety Initiative Electronic Conspicuity Working Group. The aim is to achieve a scalable way forward to developing a technology solution which is affordable and appropriate to improving situational awareness for the GA community in less dense and low complexity airspace.

Arnprior - Suggestions 263

Allow non-certified GPS to provide data for ADS-B out – essentially providing position reports on transponder signal.

This proposal will be examined by the Arnprior and Safety Initiative Electronic Conspicuity Working Group. The aim is to achieve a scalable way forward to developing a technology solution which is affordable and appropriate to improving situational awareness for the GA community in less dense and low complexity airspace.

Arnprior - Suggestions 264

Remove the need for an actual AGO system in an aircraft for IFR flight.

This proposal will be examined by the Airspace and Safety Initiative Electronic Conspicuity Working Group. The aim is to achieve a scalable way forward to developing a technology solution which is affordable and appropriate to improving situational awareness for the GA community in less dense and low complexity airspace.

Historic - Problems 265

Cannot receive money for giving ‘flying experience’ sessions so companies decide this by offering flight training.

The CAA has reviewed this suggestion as part of its established GA Programme and in conjunction with EASA proposals within the development of the Air Operations Regulations.

Historic - Suggestions 266

Introduce New Zealand NZ 145 regulation and reduce regulations on maintenance and restoration of historic aircraft.

A review of the NZCAA part 145 requirements actually resulted in a very similar set of requirements to those we have in Europe.

Historic - Suggestions 267

Make medical requirements easier to encourage involvement in historic aircraft.

An explanation of this response has been made.

Historic - Suggestions 268

Relax rules on operating passenger carrying historic aircraft so that more can experience them.

The suggestion was identified in a review of recreational aviation carried out by the CAA in 2012. The CAA’s GA programme which will run for the forthcoming three years aims to tackle this.

Historic - Suggestions 269

Insurance requirements should reflect actual operating weight, not original max weight.

This is not under the jurisdiction of the CAA.

Historic - Suggestions 270

CAA should allow flight beyond Design Authority requirement, subject to appropriate checks.

Misunderstanding as to what is allowed within the ANO & BCAR’s. However, please refer to comment 181 in the possible creation of an airworthiness experimental category.

Historic - Suggestions 271

Any new regulation should be checked and confirmed as non-burdensome to historic aircraft operators before it is implemented.

See comment response.

Historic - Suggestions 272

No Ara should be considered part of heritage.

This proposal is in line with the Better Regulation Principles laid down by the UK Government and this will ensure we review the proposed regulation with regard to proportionate application.

Historic - Problems 273

Charges to approve airfield approach procedures are excessive.

The CAA publishes a scheme of charges annually. These charges are set and agreed with the industry in the Finance Advisory Committee, which includes representatives from the GA sector.

Historic - Problems 274

Noise abatement procedures are excessive for the noise created – nulityon.

This appears to be a misunderstanding about the CAA’s role in noise abatement procedures.

Historic - Problems 275

It is too difficult to bulk/barger hangars.

We would welcome more information on this as this appears to be a misunderstanding about the CAA’s role in land use planning.

Historic - Problems 276

Aerodromes have variable fees by size but high fixed regulatory costs.

This would depend upon whether the CAA will institute a charging scheme. However, the large industry (such as BAA, BA, NATS) do cross fund the GA community within our charges.
Suggestions

Aerodromes - Problems

277 Planning regulations for small airports are identical to those for large airports. Decisions regarding planning regulations and local land use are solely within the remit of government and local authorities. The CAA has no remit with regard to these. We would welcome more information on this comment as this appears to be a misunderstanding about the CAA’s role in land use planning.

Aerodromes - Suggestions

278 CAA should allow remote switching on of airfield lights. The CAA currently allows this at Licensed Aerodromes which have Night Use Permission. CAP 686 Ch 6 para 11.1.3 states "11.1.3 The control of an AGL system from beyond the boundary of a licensed aerodrome will only be approved by the CAA for the sole use of the emergency services. Where this type of control is desired, an operational requirement proposed by the aerodrome authority and supported by the emergency services involved should be submitted in the first instance to the CAA". The CAA recognises that emerging technology utilising low power LED runway lights and mobile phones to control and monitor the lights offers the opportunity to see existing policy relaxed, whilst issues such as unauthorised interference by persons maliciously using hand held VHF radio transceivers and publication of discreet frequencies allocated to emergency services remain to be resolved. The CAA will continue to work with industry to explore ways it can help enable progress. It should also be noted that remote switching of lights at non-licensed airports and helipads is not covered by the restrictions cited above though AHVQ rules concern the display of dangerous or confusing lights inter alia may be a limiting factor.

279 Allow instrument approaches with GPS without ATC. This is not a matter for the CAA. The CAA currently allows this at Licensed Aerodromes which have Night Use Permission. CAP 686 Ch 6 para 11.1.3 states "11.1.3 The control of an AGL system from beyond the boundary of a licensed aerodrome will only be approved by the CAA for the sole use of the emergency services. Where this type of control is desired, an operational requirement proposed by the aerodrome authority and supported by the emergency services involved should be submitted in the first instance to the CAA". The CAA recognises that emerging technology utilising low power LED runway lights and mobile phones to control and monitor the lights offers the opportunity to see existing policy relaxed, whilst issues such as unauthorised interference by persons maliciously using hand held VHF radio transceivers and publication of discreet frequencies allocated to emergency services remain to be resolved. The CAA will continue to work with industry to explore ways it can help enable progress. It should also be noted that remote switching of lights at non-licensed airports and helipads is not covered by the restrictions cited above though AHVQ rules concern the display of dangerous or confusing lights inter alia may be a limiting factor.

280 Airfields should be greenfield or otherwise protected from development. Some airfields should be kept for emergency landing purposes. We agree that a proliferation of closures of GA airfields would be a loss of amenity to the GA community but it is ultimately for the local community and government to decide the relative importance of land use. CAA expert safety advise is sought by government in some cases of planning dispute.

281 Airfields should not have opening hours or require prior permission. Airfields should be greenfield or otherwise protected from development. Some airfields should be kept for emergency landing purposes. We agree that a proliferation of closures of GA airfields would be a loss of amenity to the GA community but it is ultimately for the local community and government to decide the relative importance of land use. CAA expert safety advise is sought by government in some cases of planning dispute.

282 The meaning of this comment is not clear. I think it might be implied that GA aerodromes are closing and they are then not being used for emergency landing purposes. We agree that a proliferation of closures of GA airfields would be a loss of amenity to the GA community but it is ultimately for the local community and government to decide the relative importance of land use. CAA expert safety advise is sought by government in some cases of planning dispute.

283 CAA has no remit with regard to these. We would welcome more information on this comment as this appears to be a misunderstanding about the CAA’s role in land use planning.

284 This is outside the jurisdiction of the CAA.

285 This is not a matter for the CAA. We would welcome more information on this comment as this appears to be a misunderstanding about the CAA’s role in land use planning.

286 The CAA recognises this as an issue some time ago. A cross-CAA project team has been working to develop a new risk based policy which would allow applications for Instrument Approach Procedures to be submitted by operators of some aerodromes which do not meet the current Aerodrome Order Article 172 requirement for an Approach Control service to be provided. This would be on the basis of individual safety analysis and is likely to be introduced on an incremental basis where the safety case is sufficiently robust. A new CAP is currently being drafted which outlines this process and will be submitted for public consultation later this Summer. If the response to consultation is positive we hope to implement this policy as soon as possible thereafter.

287 Misunderstanding about the CAA’s role in land use planning.