

CAA response to the GA Red Tape Challenge

CAP 1123



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Introduction

The UK General Aviation (GA) sector finds itself under increasing strain as costs of operation rise due to fiscal pressures, a greater focus on environmental issues and the application of a European regulatory framework, and perceived over regulation by the CAA. Too much prescription in the rules and a lack of proportionality have both impacted adversely on the sector.

The Government's GA Red Tape Challenge (RTC) was both timely and welcome. It has given my colleagues and I at the CAA a powerful reminder that we need to inject more pace into how we introduce a more proportionate and risk-based regulatory regime for the UK GA sector and push harder for change across Europe to meet the demand evident from the GA community.

I have often been told that the CAA has a level of engagement with its stakeholders that is unrivalled amongst other national aviation authorities. That may be the case, but we obviously need to achieve more and be better partners with the GA community. The new GA Unit I am setting up in the CAA is a key part of that new approach. Its focus will be entirely on the GA sector. It will ensure that the regulatory regime for GA sector will take a different path and be less onerous to that applied to the commercial aviation sector. The Unit will be committed to eliminating unnecessary regulation and will be staffed by colleagues who have an intimate working knowledge of general aviation and a commitment to it flourishing without compromising safety. The Unit will make sure we better understand the impact of our interventions on the sector; that we are more open and transparent with the sector; and we identify opportunities to reduce burdens and costs wherever we can. We want help create a vibrant and dynamic GA sector in the UK and will work with other Government Departments to identify the potential for funding to develop new technology.

The GA Unit will draw in the work we started following the review we carried out in mid-2012 of the UK's regulatory approach to Recreational Aviation - the RA-2 review. It will also press the European Aviation Safety Agency (EASA) Management Board to make progress on the report prepared in August 2012 by a Working Group on how the regulatory approach to GA safety at the European level could be improved.

This document and the accompanying spreadsheet deal with our responses to the specific issues raised through the Red Tape Challenge. We have already started to deliver change and, I hope, improvements for the GA sector. Since the Government launched its GA Red Tape Challenge we have, for example:

- publicly committed to identify and eliminate regulatory 'gold-plating', which some RTC respondents said the CAA habitually did;
- launched a consultation on deregulating for airworthiness purposes all UK-registered single-seat microlights;
- launched a central, corporate CAA Complaints procedure which RTC respondents rightly pointed out we did not have;
- secured EU agreement to allow the UK to continue to issue the Instrument Meteorological Conditions (IMC) rating for pilots until April 2019;
- published new, simpler guidance for private pilot licensing; and
- started to put all our forms online after reviewing, shortening and removing duplication of information requested wherever possible.

For our future work there will be two guiding ambitions and principles: deregulation and delegation to remove the bulk of GA from the current regulatory oversight of the CAA. Naturally we would prefer to deregulate wherever possible. But in some areas, delegation may be more appropriate to ensure the UK complies with its international and European obligations. Crucial to the success of both options will be the risk appetite of the CAA, other parts of Government and the sector itself.

Guiding principle 1: Deregulate wherever possible.

This option will cover three key themes:

- removal of CAA oversight/rule-making in areas where we have no EU obligation, for example: airworthiness of small microlights; the regulation of light aircraft noise; or the regulatory approach to display pilot Authorisations. These changes can be easily implemented by adjustments to Civil Aviation Publication (CAP) documents and, where necessary, amendments to the Air Navigation Order/Rules of the Air;
- identify what within the GA sector might be removed from EASA oversight. These will primarily be areas that are nationally-based and where previous operating regimes have shown accepted safety, for example gliding and ballooning. We will do this work with colleagues at the Department of Transport as it will require a shift in the UK's relationship with the European Union. We will also need to minimise any unintended consequences such as the sector's ability to operate and trade outside the UK's borders;

- ease the definition of 'commercial activity' by introducing the principle of 'informed consent' to move the onus on participants to demonstrate their awareness of risks involved in certain GA activities. This will shift the CAA's role from regulation/authorisation to providing guidance and oversight to help participants to make an informed choice. While accountability for safety will rest with the participants, it will be necessary to have a dialogue with others in Government and the public on their appetite for such deregulation on a case-by-case basis.

We have started to review the numerous permissions and exemptions that are issued each year to decide which areas might be completely taken out of regulation; removing administrative burdens and associated costs and delays.

Guiding principle 2: Maximise delegations

We wish to maximise delegations to the extent that industry appetite and competence and resilience are the only constraints.

Here the CAA would retain overall accountability so that the UK continues to meet its international and European obligations, but responsibility for delivery of the regulation would be delegated to one or more Qualified Entity. A Qualified Entity would deliver regulatory oversight locally and, being closer to the sector than the CAA, do so in a manner more proportionate and efficient for that sector. They could legitimately compete with each other for business, with fees and charges set by market demand.

We have already delegated responsibility to industry in some areas so we know it can work but our ambition is to do more:

- airworthiness approvals granted to the Light Aircraft Association (LAA) and British Microlight Aircraft Association (BMAA);
- flight crew licensing assessments which are delegated to National Pilot Licensing Group Ltd (NPLG Ltd);
- the Direct Issue process which allows certain aircraft manufacturers to recommend the issue of a Certificate of Airworthiness without a CAA survey.

The Red Tape Challenge has also been helpful in highlighting some of the myths that exist amongst the sector and for us to correct them. For example you don't have to wear a helmet when doing aerobatics - that's for you to decide; you can fly at night in the UK in a single engine aircraft, providing you

have the appropriate rating on your license; and you can land at night without runway lights - that is for you to assess the risk. Other "myths" are corrected in the body of this response.

I mentioned at the outset the value that we place on an open and meaningful dialogue with the general aviation community. We have many areas of work and options to explore but we recognise that it is critically important that we fully engage with stakeholders to determine their priority and appetite and to incorporate their ideas as well. They will need to be confident that we are resolute in our commitment to this programme and that we will work constructively with them at every stage. That is why one of the very first tasks for the Unit will be to consult actively with stakeholders on our planned work programme without whose support and co-operation we will be unlikely to deliver on our commitments.

I hope that readers of our response to the General Aviation Red Tape Challenge recognise that we are making a step change in how we deal with the UK General Aviation sector, and will embrace working in partnership to provide regulatory solutions that are risk-based and proportionate to the needs and appetite of the sector. Of course we should be judged on our results and I look forward to hearing back from the General Aviation sector and the Challenge Panel on how we are doing.

A handwritten signature in black ink that reads "Andrew Haines". The signature is written in a cursive, flowing style.

Andrew Haines

CAA Chief Executive

Background

The Government launched its General Aviation Red Tape Challenge on 11 April 2013. It ran for five weeks until 16 May 2013 and was widely publicised across the GA sector. The structure of this Red Tape Challenge consultation was deliberately open-ended and did not seek views, as previous Red Tape Challenges had on other issues, on a series of questions or a particular set of regulations.¹ Instead, the Government sought views across eight broad themes:

- Common themes & the CAA;
- General aviation pilots;
- General aviation airfields;
- Maintenance;
- Airspace management;
- Training and instruction;
- Historic aircraft; and
- Innovation & other.

The Government received a total of 330 substantive comments via the Red Tape Challenge website and email inbox. Officials at the Department of Transport analysed each of these which resulted in some 270 items for active consideration, primarily by the CAA but also other parts of Government.

The spreadsheet at Annex A shows the CAA's response to each of these items. The majority have been or will be actioned over the coming months, although there were some suggestions that were misunderstandings. The CAA will clarify the situation where possible.

This report deals with those areas for which the CAA is responsible. The analysis does not cover every suggestion; rather it focuses on the main recurrent issues in each theme.

¹ www.redtapechallenge.cabinetoffice.gov.uk/themehome/general-aviation-theme/

Common themes & the CAA

A fundamental theme running across the Red Tape Challenge was communication between the CAA and the GA community. Many felt that the CAA's website could be improved and accessibility of CAA guidance made better. The Flight Crew Licensing: Mandatory Requirements, Policy and Guidance², CAP 804, attracted particular criticism.

Another common concern was that regulations appeared to be introduced without due consideration of how they might impact on the GA sector. Many suggested that before any new regulations, interventions or guidance are introduced, their impact on the GA sector should be assessed and suitable changes made to reduce the impact, without compromising safety. They asked that regulatory interventions should be risk-based, proportionate and the minimum necessary for safety.

There was naturally a strong desire to see greater efficiency from the CAA and a more customer-centric approach.

There was a general dissatisfaction with EASA rules and a perception that the CAA is prone to gold-plating these rules. The CAA has already responded publicly to this challenge. The CAA announced on 4 June that it is "committed to identifying and eliminating any such gold-plating".³

CAA response

GA Unit

The Government's response to the general aviation Red Tape Challenge refers to the new General Aviation Unit that the CAA is setting up to handle all aspects of its oversight of the GA sector. The new Unit will be fully established by April 2014. With broad recognition within the UK that regulation intended for commercial air transport should not be read directly across to the GA sector, the CAA believes setting up a Unit focussed entirely on the GA sector is an appropriate response. The objectives of new Unit will be to:

² <http://lgwmsiis03/caapublications/pubs/cap804jan2013.pdf>

³

www.caa.co.uk/application.aspx?catid=14&pagetype=65&appid=7&newstype=n&mode=detail&nid=2244

- develop and adopt an evidence and risk-based approach proportionate to the risk appetite of participants while still ensuring protection of uninformed third parties;
- cut unnecessary bureaucracy, reduce disproportionate regulation and support and encourage the growth of a vibrant GA sector for the UK;
- develop a culture of transparency and openness and to support and educate the GA sector to encourage sustainable compliance and use legal powers only as a last resort; and
- improve communication with the GA sector, for example by providing targeted, relevant information in more accessible ways.

The Unit will also feed into any reform of the Air Navigation Order.

The GA Unit will have responsibility for airworthiness, operations and associated personnel training and licensing for non-commercial aircraft and 'other-than complex' aircraft. This will encompass aircraft ranging from microlights and amateur-built aircraft, through balloons, airships and gliders, to piston twins and single-engine turbine aeroplanes up to 5700kg Max Take-Off Mass (MTOM), and single-pilot helicopters up to 3175kg MTOM. This is wider in scope than the originally anticipated 2,730kg aeroplane classification and as such provides greater coherence with EU regulatory classification. Hence CAA and industry oversight accountability. It will also have oversight of associated maintenance and training organisations and additionally provide guidance and influence over aerodrome and airspace matters affecting the GA sector.

The Unit will be staffed by GA experts with knowledge and experience appropriate to the sector. They will be responsible for implementing a comprehensive programme of deregulation and where feasible allow the GA sector to take on more responsibilities for its own safety. Work on a number of initiatives has already started, such as the deregulation for airworthiness purposes of single-seat microlights launched at the end of September, and will continue while the new Unit is set up.

The Unit will take the lead role within the CAA of working with EASA and colleagues in other national aviation authorities in the negotiation and implementation of EASA's GA Safety Strategy.

The Unit will also work with other parts of the UK government to identify opportunities where funding to develop new technology could reduce costs for the sector, especially for safety innovations associated with interoperability with the commercial air transport sector.

The Unit will develop a full GA reform programme that will build on and supersede the CAA's "RA2 programme" that emerged from the review conducted in mid-2012 of the regulatory framework applying to the sport and recreational sector of GA. The full delivery plan will be in place by April 2014.

The CAA welcomes the "critical friend" role that the Government's Challenge Panel will provide and looks forward to both its challenge and its support on this important agenda.

CAA website and communications with the GA sector

Over the past 18 months the structure and much content of the CAA website has been refreshed. This year the CAA completed the second phase of the content restructure project. Further work is underway to improve content across the website, but high level navigation and content has been considerably improved. There is a new search engine and user-based navigation.

The CAA also took advantage during the website restructure to split the General Aviation section. It placed Recreational Aviation (RA) aspects into its own area and merged content for Air Operator Certificate (AOC) holders into the commercial aviation pages. The CAA has since developed a 'persona' for RA pilots, providing much of the routine search responses via a single page. The CAA will continue to develop and promote that 'persona' while also looking to add further suitable content. The CAA has a project, to be completed by the end of October 2013, to revise completely the content for pilot licensing to make it much simpler and appropriate.

The CAA is carrying out a fundamental review of The Flight Crew Licensing: Mandatory Requirements, Policy and Guidance, CAP 804. It published new guidance for private pilot licensing on 25 October.⁴ Further updates will be published before the end of the year.

⁴ www.caa.co.uk/application.aspx?catid=14&pagetype=65&appid=7&mode=detail&nid=2303

Digital by default

The CAA is working to be digital by default.

The CAA has launched an ambitious programme to review all of its forms, reduce their number and length where possible, eliminate duplication and pre-populate forms where it already holds information or, where this is not possible, not to ask for the information again. The CAA has identified 21 airworthiness forms, which was the first area to be tackled under the programme. These will all be online by the end of this year, with all licensing forms following by June 2014. The demand for EASA licence conversions remains high and this will be one of the first online licensing forms. The CAA expects about 70 per cent of all licensing transactions to be online by this Christmas.

Transparency in fees and charges

Each year the CAA consults the aviation industry on its fees and charges through its Finance Advisory Committee (FAC) as well as through a public consultation via the CAA web site. The General Aviation sector is represented on the FAC through the Aircraft Owners and Pilots Association (AOPA); British Business Aviation Association (BBGA) and Royal Aero Club (RAeC). There is also a GA Sub-Group of the FAC. This will meet before Christmas 2013 to review the CAA's fees and charges in relation to the GA sector. The CAA will also consider proposals for contestability in order to keep charges in check.

Within the CAA, accounted GA work presently approximates to some 40 Full Time Equivalents (FTEs), with costs of £3.9 million and income from fees and charges of £3.0 million. The costs here are conservative as the CAA carries out much work that impacts on or from which the GA sector benefits, such as airspace reform and EU negotiation, which is not directly charged to the GA sector. A recent example of this is the considerable work that the CAA has undertaken negotiating with EASA and the European Commission to secure the future of the IMC rating for the UK. The CAA announced the European Commission's proposal to allow the UK to continue issuing the Instrument Meteorological Conditions (IMC) rating for pilots until April 2019 on its website on 17 October 2013.⁵

CAA complaints process

A number of respondents observed that the CAA did not have a central, corporate complaints procedure. The CAA has now put one in place and details

⁵ www.caa.co.uk/application.aspx?catid=14&pagetype=65&appid=7&mode=detail&nid=2298

are on the CAA website.⁶ The policy enables complaints to be put in writing via email or post, and requires the CAA to respond within defined turnaround times: five working days for acknowledgement of a written complaint and 20 working days for a full reply. The CAA will publish information in its Annual Report about the number and types of complaints it receives, and the percentage upheld.

CAA Enforcement Policy

Some respondents suggested that the CAA "makes rules to suit the regulator rather than to deliver aviation safety for the UK". The CAA would naturally disagree with this perception, but recognises that it is a view some of its stakeholders hold and it needs to deal with the reality. The CAA is committed to evidence and risk-based interventions. It will apply these principles to its GA programme and will actively check back with stakeholders that it is holding true to the principles.

The CAA has a publicly available Regulatory Enforcement Policy⁷ which explains clearly to all those who interact with it how it will enforce its rules in a proportionate and targeted manner. The CAA will only seek prosecution through the courts in the most serious of cases. It is considering how it might make better use of civil sanctions, where appropriate, but first and foremost it seeks to bring the individual or organisation back into compliance in the most appropriate way.

General aviation pilots

The transition to EASA licensing for pilots was the subject of a great number of comments. Many respondents felt that the transition had not been properly planned, leading to long turn round times and confusion.

Medicals were also a common concern. Some respondents suggested that the need to have a medical carried out by an Aero Medical Examiner (AME) increases costs for no clear benefit.

The result of gliding coming within the scope of European aviation regulation was raised by several respondents.

⁶ www.caa.co.uk/complaints

⁷ www.caa.co.uk/default.aspx?catid=2516

Several respondents argued that the boundary between microlights and single engine aeroplanes was becoming less distinct and that meant that the current licensing system created duplications and inefficiencies for pilots. Some similar comments regarding the Permit to Fly – Certificate of Airworthiness boundary were also received.

There was very strong support for retaining the Instrument Meteorological Conditions (IMC) rating. There was also firm support for simplifying the licensing scheme and easing medical requirements.

CAA response

The majority of issues raised under this topic related to the licence a pilot is required to have, including the medical requirements to obtain a licence and who can give medical approval. The CAA accepts that its service standards fell unacceptably low during the transition to EASA licensing. This was because of the sheer volume of licences that had to be changed. Although pilots have until April 2014 to obtain a new licence, some 50 per cent applied in the first six months of the UK transition start date of 17 September 2012. The situation has now been resolved and the turnaround time for licences is within the published turnaround target of ten days.

There were also queries about being able to transfer military experience into credits for commercial/recreational licences. The latter is based on a misunderstanding as credits for military pilots have been agreed between the CAA and the Ministry of Defence and have been submitted to EASA as the regulations require. These terms are published in CAP 804 and will be made clearer in the revised publication.

A respondent suggested that licence renewals were 'pointless' when check flights and medicals already flag any issues. This issue has already been addressed by the introduction of non-expiring national and EASA licenses.

One respondent correctly highlighted that the current licensing system requires some rotary pilots to have both an EASA and a national licence. This is unfortunately unavoidable as helicopters have type ratings and Annex II type ratings cannot be added to a Part-Flight Crew Licensing (FCL) licence. However, any pilot who holds a Part-Flight Crew Licensing licence and qualifies for an Annex II rating will be provided with an equivalent national licence including that rating. The medical certificate will be valid for both licences.

The CAA argued strongly and successfully in favour of a GP-based, rather than AME-based, medical for the EASA Light Aircraft Pilot Licence.⁸ The CAA cited its own positive experience using such an approach with the UK national Private Pilots Licence. The CAA has issued clear guidance for GPs and AMEs stating which doctors may undertake which assessments.

GPs may undertake assessments for the Light Aircraft Pilot Licence when an applicant has no major medical history and AMEs should undertake assessments when aviation medical knowledge is required to make the assessment of fitness. This is a proportionate, risk-based approach and a significant benefit to the UK aviation industry, which the CAA campaigned alongside industry to achieve. The concept of the GP is not fully understood in the rest of Europe and there was a significant push back from other Member States to allow only AME certification. The CAA is not responsible for setting fees for the medical assessments and the fees charged by AMEs and GPs may vary.

General aviation airfields

Several stakeholders commented that airfields should not have restrictions such as opening hours or require prior landing permission. Others raised concerns about what they perceived as mandatory ground-handling fees. A popular suggestion was to allow instrument approaches using Global Positioning System (GPS) without Air Traffic Control approach control, as in the US and France.

CAA response

On airfield opening times, these are a matter for the airfield to decide. The hours are published in the UK Aeronautical Information Publication⁹ in accordance with International Civil Aviation Organisation (ICAO) requirements.

For a licensed aerodrome the CAA requires that licensing standards are met during the opening hours. The hours may vary depending on local planning conditions and environmental considerations. Operations outside of the published opening hours are a matter for agreement between the aerodrome and the parties concerned. The licensing standards also include the provision of the agreed level of rescue and fire fighting provision. In September 2013 the

⁸ The LAPL is the EASA version of the UK national Private Pilot Licence (PPL) and is valid throughout the European Union

⁹ www.nats-uk.ead-it.com/aip/current/amend28/AIPNEW1.pdf

CAA removed its oversight of Rescue & Fire fighting staffing levels at public transport aerodromes. This means that these aerodromes will be able to reduce their costs by setting staffing levels appropriate to the risk and shared with local authority 'blue light' agency partners.

The CAA understands the frustration expressed in respect of mandatory handling fees levied on recreational GA at some regional airports. Such handling arrangements are not a requirement of an aerodrome licence. The CAA recognises and would endorse the benefits of operating to and from regional airports can bring to the GA sector and would hope that such aerodromes do not put barriers in their way.

The suggestion to allow instrument approaches is very helpful. The CAA had also identified this as an issue for the GA sector.

In September a cross-CAA project team consulted with industry on proposals for a new risk-based policy which will allow applications for GPS Instrument Approach Procedures (IAPs) to be submitted by operators of some aerodromes which do not meet the current (Air Navigation Order Article 172) requirement for an Approach Control service to be provided. The CAA recognises that the UK lags significantly behind other countries in this area and will ensure that maximum advantage is taken to introduce such Instrument Approach Procedures wherever possible.

A new CAP is being drafted which outlines this process and has been published for public consultation.¹⁰ With a positive response to this consultation the CAA will implement this policy as soon as possible thereafter.

Maintenance

There was a general widespread perception raised in a variety of examples that GA maintenance requirements are not proportionate or reflective of actual maintenance needs. EASA rules, in particular those relating to the maintenance and continued air worthiness of light aircraft, were highlighted as increasing the regulatory burden in terms of paperwork and cost but with no tangible additional safety benefit.

There was naturally a desire for a regulatory system that allowed industry professionals to exercise more of their own judgement, such as determining

¹⁰ www.caa.co.uk/application.aspx?catid=14&pagetype=65&appid=7&mode=detail&nid=2302

when parts needed to be replaced. Some respondents queried why they are not able to carry out maintenance on their own aeroplane.

A popular suggestion was for there to be some mechanism for voluntarily orphaning aircraft from a Certificate of Airworthiness to a Permit to Fly. This reflected a common concern that there was an increasingly large gap or hollowing-out between the two regimes.

There were complaints about the frequency and cost of CAA audits. Several suggested that, once approved, maintenance organisations should be able to carry out their business without having to seek further approvals by type and so on.

CAA response

The CAA recognises that EASA rules on maintenance have increased the regulatory burden on the GA sector. The CAA is working with EASA to define more proportionate rules on GA maintenance programmes and oversight, with preliminary regulation in this area expected before the end of this year and is also engaged with the US Federal Aviation Authority on establishing bilateral arrangements for mutual recognition of approved modifications.

The CAA will also consider whether contestability would work in this area as a means of reducing costs. This work will be included in the overall GA programme.

The basic maintenance needs of an aircraft are set by the manufacturer during product development. Maintenance regimes for commercial and private use are not fundamentally different. However programmes do need to be customised depending on the operation and the operators' experience. This basic concept applies whether an aircraft holds a Certificate of Airworthiness or a Permit to Fly.

Forthcoming changes should allow those that service GA aircraft to exercise more judgement, such as, for example, when parts need to be replaced. Indirect privileges used for the approval of maintenance programmes, when exercised, do not incur a charge and can also be used to allow organisations to manage small changes to their scope of approval

In relation to the questions relating to pilots/owners not being allowed to carry out maintenance on their own aircraft, this is a misunderstanding. Current regulations allow for pilot/owner maintenance of defined tasks. Private owners can also carry out more extensive work on their aircraft under the supervision of

a licensed engineer. The CAA will look at the guidance on pilot/owner maintenance to see where it can be made clearer.

On the frequency and cost of audits, the CAA recognises that audits of those companies that maintain GA aircraft need to be proportionate. The CAA has reviewed the frequency of its audits and has decided to make them more proportionate to the risk presented to the public. In many cases, this will reduce audit frequency to the minimum permitted by legislation and focus audit activities on areas of greatest risk. The CAA believes that managing its oversight using this methodology will help reduce compliance costs and encourage owners of UK-based EASA aircraft to use the UK register.

Airspace management

A number of respondents suggested that the UK's airspace policy should be fundamentally reviewed to take account of newer technology.

One respondent noted that GA aircraft have to fly low beneath Class A airspace, despite the fact that the commercial planes are thousands of feet above.

Others suggested simplifying and rationalising airspace structures, including the removal of sharp corners and protrusions which were believed to be used to maximise the amount of controlled airspace.

There was a common perception that airspace changes are made at the behest of commercial interests and that GA was not given due consideration. Several respondents noted that it was vital that uncontrolled airspace remained contiguous, to prevent some aircraft being trapped in pockets. It was felt that airspace generally changed from uncontrolled to controlled and rarely the reverse.

A mandatory requirement for Mode S transponders was opposed by many respondents. However, many supported greater use of technology, for example creating online charts, promoting third-party tools or allowing greater flexibility in how tools such as GPS are used.

CAA response

On reviewing airspace, the CAA's Future Airspace Strategy (FAS) is about a fundamental redesign of the UK's airspace. It is not focused solely on Commercial Air Transport (CAT) operations. There is a dedicated FAS General Aviation Sub-Group facilitated by the CAA. The FAS envisages that future airspace designs will take full advantage of the better aircraft performance and

technology available today. The CAA expects, wherever possible, that maximum use of Continuous Climb Operations and Continuous Descent Operations will be made. This should free up some of the lower levels of Controlled Airspace allowing base levels to be simplified and in places released back to Class G.

The Future Airspace Strategy outlines new proposals for UK airspace to 2030 to address these issues:

- the Strategy has been developed by the CAA, together with the Department for Transport (DfT), Ministry of Defence and National Air Traffic Service (NATS). FAS Programme Board comprising the CAA, NATS and DfT is progressing the work while an FAS Implementation Group, that comprises airlines, airports, NATS etc as well as GA representatives, ensures that the project aims are met operationally;
- the Strategy provides a framework for NATS, airports and airlines to make airspace simpler and more flexible and use the latest technology to allow aircraft to take more direct routes. This is a real opportunity to increase capacity, cut delays and reduce the overall environmental impact of aviation in the UK;
- ultimately NATS will need to re-design and develop the air routes and procedures used to deliver the benefits of FAS; and
- during 2012 the CAA completed an initial consultation on an increase to the Transition Altitude. A follow-up consultation is expected over the 2013/14 winter period. Increasing this altitude will enable many of the airspace changes linked to the Strategy, including the potential for release of airspace for the use of GA and others, enabling more flexibility for GA use of lower airspace.

There were some comments related to airspace around particular airports. For example one respondent said that Glasgow Class D was designed to protect a two runway operation but the second runway had been decommissioned. The Glasgow Control Zone was originally predicated on the operation of a second runway. An approval requirement for Glasgow was that they should review their current Control Zone shape. A preliminary meeting during September 2013 identified some scope for reduction with a view to implementation in summer 2014 after the Commonwealth Games.

Another respondent suggested that there should be an escape procedure in place over London should something go wrong. This is an important issue.

Contingency plans and procedures are already in place to disperse flights safely within the London Terminal Manoeuvring Area and its associated controlled airspace. These are managed by the en-route air navigation service provider NATS.

As in other parts of the Red Tape Challenge some comments were misunderstandings of the current rules. Some questioned what is known as the "500ft rule". Normally an aircraft should not be flown closer than 500 feet to any person, vessel, vehicle or structure,¹¹ without written permission from the CAA. In reality, aircraft landing and taking off in accordance with normal aviation practice are exempt from the 500 feet rule regardless of the kind of aerodrome at which it is operating, not just at government or licensed aerodromes.¹²

Training and instruction

The main issue raised under this theme was the transition of Registered Training Facilities (RTFs) to Approved Training Organisations (ATO) as required by EU regulations. Many felt that the prescriptive nature of the regulations were far in excess of what was needed for safety. Of particular concern was the impact on small owner/manager operations.

One respondent suggested that the CAA should prepare a standard template training manual for schools.

Some questioned why Permit to Fly aircraft cannot be used for commercial training. Others suggested that flight instructors, once approved, should be given greater professional responsibility and should not need to have to request so many approvals from the CAA, for example when performing check flights.

There were a number of issues raised about the theoretical knowledge examinations. One respondent suggested that some questions in the commercial licence examinations are unintelligible.

CAA response

Respondents to the Red Tape Challenge were correct to highlight the new requirement under EU regulations that flying schools who give instruction for non-commercial licences must for the first time be approved.

The CAA has taken up the suggestion of a preparing template manual. A manual has been developed, with the industry's assistance, and will be

¹¹ Section 3 of Part 2 of the Air Navigation Order (ANO)

¹² Section 2 page 7, para 6aii of the ANO

published by the end of October 2013. Copies of the manual will be available at the roadshows the CAA is holding across the UK in November this year, and is available to download from the CAA website.

The CAA has noted the perception that it has gold-plated the EASA requirements in many areas, for example the requirement for Approved Training Organisations to integrate Safety Management Systems into their organisation. The CAA is committed to taking a proportionate approach in this area. It has already published SMS guidance for small, non-complex organisations on its website.¹³ The CAA is considering what further assistance it can give on this issue and tackling any perceptions of excessive regulation coming from EASA. It is welcome news that the Government has secured EU agreement that the applicability of commercial safety standards to general aviation should be included in the European Commission's Regulatory Fitness and Performance Programme (REFIT).¹⁴

The roadshows starting this autumn will be one way of increasing communication with industry on this issue. The first roadshow is on 1 November at the CAA's Gatwick Office. Later ones are at various locations around the UK. The roadshows will provide the tools to help organisations to prepare an SMS proportionate to their needs.

One respondent observed that an Approved Training Organisation must have access to suitable aircraft and questioned whether the CAA interpreted this to mean to own or lease and questioned whether a student may learn to fly in their own plane or in a group-owned Permit to Fly aircraft. This is a misunderstanding.

From the licensing perspective, the Approved Training Organisation 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 aircraft, which limits the circumstances where payment may be made for use of the aircraft. The use of Permit to Fly aircraft for commercial training will be addressed as part of the GA programme.

One respondent questioned why a fixed-wing instructor cannot examine an autogyro student in theoretical knowledge examinations, on the basis that the

¹³ www.caa.co.uk/application.aspx?catid=33&pagetype=65&appid=11&mode=detail&id=5612

¹⁴ http://ec.europa.eu/smart-regulation/better_regulation/key_docs_en.htm

papers are exactly the same. This is not the case. Some of the papers for gyroplanes are the same as for other aircraft, while others are specific to gyroplanes. At the Private Pilots Licence level, the exam papers are marked by the Ground Examiner (who must also be an instructor) who is supervising the examination. This means that the gyroplane examinations have to be conducted by a gyroplane Ground Examiner.

There were a number of issues raised about the theoretical knowledge examinations. One respondent suggested that some questions in the commercial licence examinations are unintelligible. EU legislation requires that the CAA draws the examination questions from the Central European Question Bank. The CAA welcomes any examples of what are seen as 'unintelligible' questions so that it can raise them with those who set the questions. The CAA is also looking closely at the number of questions asked. Should these exceed the number suggested by EASA, the CAA will investigate why and reduce the number where there is no valid reason to have more.

Another respondent questioned why the CAA does not allow additional time in examinations for dyslexia sufferers. The time allowed per question is also set out in European law. To allow greater time would require exemption or derogation which would have to include justification that compensating measures to assure no reduction in standards had been applied. The CAA would welcome comments on what might be suitable compensating measures.

One respondent suggested that the CAA has determined that examiner courses need to be longer than that required by EU law and this is gold-plating. It is helpful to receive specific examples such as this and the CAA will investigate this by the end of November as part of its commitment to eliminate gold-plating. Any changes will be made by the end of the year.

A couple of comments were made about check flights. One respondent suggested that CAA approved examiners should not have to inform the CAA of every check flight. The CAA is pleased to confirm that in future such pilots will only need to inform the CAA annually of check flights they have carried out to maintain their examiner license.

Historic Aircraft

A popular suggestion was to introduce an 'adventurous aviation' category, similar to that in New Zealand. This would allow people to receive money for offering flights in historic aircraft.

More broadly, reduced regulations on the restoration and maintenance of historic aircraft were popular. In particular, lighter regulations on carrying passengers were requested.

CAA response

The suggestion to introduce an equivalent to the New Zealand Part 115 regulation (Adventure Aviation) and reduce regulations on maintenance and restoration of historic aircraft was helpful.

The New Zealand requirements are very similar to those that exist within Europe. However, in the UK most, if not all, historic aircraft fall into Annex II regulation, which means they are governed by the British Civil Airworthiness Requirements (BCAR) equivalent maintenance requirements.

These national requirements are currently being revised to introduce new provisions for aircraft operating on Permits to Fly that will cover the majority of the UK historic fleet. These requirements have been consulted on publicly and are now being finalised in collaboration with the Historic Aircraft Association (HAA).

One respondent suggested that providing 'flying experiences' often masquerades under the umbrella of 'introductory training flights'. In reality companies are not prohibited from receiving money for 'flying experience' sessions.

The CAA is aware of this anomaly, as suggested by one respondent, that providing 'flying experiences' often masquerade under the umbrella of 'introductory training flights'. The CAA is developing, with the aviation industry, a regulatory framework using the principle of 'Informed Consent' which would allow organisation to conduct certain revenue-generating 'promotional flights' within a club environment. The CAA believes that such measures will, when implemented, provide participants and uninformed third parties with proportionate protection and reduce the risk of misunderstandings in this area.

Innovation/Other

Many who responded argued that excessive regulation hampers innovation by imposing unnecessary costs and delays. They argued for an overhaul of the certification and approvals process for modifications, inventions and new equipment.

For example, several respondents argued that products approved for aviation use in other countries should be automatically approved for use in the UK, or that an experimental category, as in the United States, should be created.

There was a perception that any change incurs large costs and involves a time-consuming approval process with the CAA.

Another suggestion was allowing the use of mogas (automotive petrol) in aeroplanes. It was noted that the CAA allows mogas with some engines if they are in microlights, but not when the same engine is in an aeroplane.

Some suggested that Permit to Fly aircraft should be able to allowed to fly instrument rules if suitably equipped.

CAA response

The CAA's GA Programme is intended to help foster innovation in the GA sector by considering the potential. Initiatives already started include:

- creating a 'commercial experimental' aircraft category to facilitate proof-of-concept flight testing subject to professional competence and proportionate operational restrictions;
- simplifying processes for modification, changes and repairs;
- improving the substitution of obsolete or out of production materials;
- allowing certain Permit to Fly aircraft to fly at night and/or in instrument conditions if appropriately equipped; and
- simplification of the means to allow flights for test purposes (without a standard valid Certificate of Airworthiness/Permit to Fly).

One particular response about the empty weight limit of Single Seat Deregulated microlights has been fully addressed by deregulating for airworthiness purposes all aircraft which fall into the Annex II 'single seat microlight' category. Public consultation on this initiative ends in early

November 2013 and if there is approval for the measure a General Exemption will be issued very soon after.

The CAA permits the use of mogas in aeroplanes when qualified by the engine and airframe design approved holder.

In 2014 the CAA will review the complete set of Design and Production Organisation approval requirements to provide a more proportionate framework for Annex II aircraft.

Changes have already been made to ease the process of parts certification for EASA GA aircraft through changes to Part 21 introduced in Regulation (EU) 748/2012. EASA is committed to publishing new guidance material in the summer of 2014 that will enable consistent application of these new more proportionate requirements.

One respondent suggested that the CAA does not allow silencers to be fitted without an expensive approval. This is a misunderstanding. If a silencer installation or any other modification has been previously approved by EASA or an EU member state before 28 September 2003, it can be installed on a UK aircraft without further approval.

Next steps: right to reply

The Government and the CAA would welcome your feedback on this response to the GA Red Tape Challenge. We would also welcome any suggestions for growth projects. Comments and suggestions should be sent to redtaperesponse@caa.co.uk by Friday 6 December 2013. Your feedback and suggestions will be shared with the Challenge Panel who will take them into account when preparing its report to Ministers due in April 2014.

RTC Category	RTC Item	RTC Comment	CAA Comment	CAA Intent
Common Themes	1	There is a general view that many regulations increase complexity and cost without improving safety. New regulations should be assessed against the improvement to safety.	All new regulations, including European regulations, have to be supported by a Regulatory Impact Assessment (RIA,) and increasingly Pre-RIAs, which ask whether regulatory action is needed at all. In these, the appropriate regulator sets out the driver for making the proposal (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 Rulemaking Process 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.	We agree. The CAA will commit 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 and amend those existing regulations which are shown to add unnecessary cost and regulatory burden for no safety benefit.
Common Themes	2	Many rules are seen as for the benefit of regulators. For example, the Permit to Fly / Certificate of Airworthiness boundary is sometimes arbitrary and many unnecessary restrictions are imposed.	The standards applied to Certificates of Airworthiness are derived from ICAO. The underlying principle is that if an aircraft qualifies for a CofA it must be issued with one. Fixed criteria for many rules are a necessity for any regulatory system to function. Arbitrary limits/criteria are sometimes applied because it is not practical to apply risk-based assessment to every case. Doing so would require considerably greater resource than is available to the regulators and increase overall cost to the industry.	We disagree. As a specialist aviation regulator the CAA is obliged to develop and apply interventions (regulatory or otherwise) to mitigate identified safety risks. The CAA, like all regulators, is able to apply its judgement in the application of such regulation proportionate to the situation. The CAA will introduce risk-based regulation where possible and appropriate - or encourage EASA to do so in the case of EU Regulations. But many arbitrary rules - 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.
Common Themes	3	There is a universal desire for greater efficiency from the CAA: less paperwork, fewer requirements, faster turn-around times, etc. The FAA was repeatedly held up as a model.	This desire is shared by the CAA and is evidenced in the Process and Performance Improvement programme already under way. Considerable improvements in efficiency have already been achieved in certain areas and the CAA will ensure that the overall benefits are notified to industry.	We agree. The CAA is already committed to a programme of improvements to achieve greater efficiency and standard of services.
Common Themes	4	There is universal opposition to CAA fees, which are seen as opaque, unrelated to the effort required and the result of CAA being a monopoly.	It is government policy that the CAA recovers its costs from those it regulates and to make a 6% return on investment. The charges are reviewed continually with industry representatives in the Finance Committee and all changes are consulted upon publicly each year.	The CAA publishes its 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.
Common Themes	5	There is a lot of criticism of the multiple roles CAA has by setting rules, investigating non-compliance and prosecuting. It is seen as judge, jury and executioner, giving it undue power over individuals.	The CAA has recognised the 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 executing all of 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 also harmonised across the different industry sectors and itself complies with the EASA requirements. There is a statutory right of review (appeal) against any refusal, variation, suspension or revocation of a licence, certificate or approval issued by the CAA. If 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 focussed on improving industry's safety performance, by education, re-training or licensing action.	We believe this to be a misunderstanding of the role and powers of a regulator. The CAA is developing material for publication that will explain clearly its enforcement policy.
Common Themes	6	'Belts and braces' approach where CAA controls entry into the sector (via licensing, permits, etc.) but then does not trust these approved individuals to make their own assessments.	The CAA firmly believes that the responsibility for operational safety should be held and discharged directly by nominated personnel in the industry and promotes this approach. In addition, the CAA has already delegated powers to representative bodies who have demonstrated the competence and durability to take on such powers. Examples are the airworthiness of homebuilt and microlight aircraft which the LAA and BMAA handle respectively, and the NPPL where applications are processed by NPLG 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 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 may take up privileges and responsibilities. The CAA will therefore, through the new GA Unit, promote this aspect in particular to help industry to maximise the use of delegated powers and to take on more responsibility.
Common Themes	7	There is a need for better communication and explanations right across the organisation.	Accepted. The CAA is developing an improved communications strategy and is working to be more transparent.	We agree. The CAA is developing 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 leaflets that explain the pilot licensing regulations in a clearer, more accessible format in addition to the basic requirements contained in the publication CAP 804.
Common Themes	8	CAA should start with aim of finding most light-touch way of implementing rules and work from there. There are many accusations of gold-plating and CAA not putting up enough of a defence against EASA rules.	The CAA is committed to ensuring that there is no "gold-plating" of EASA requirements and will remove any such additional requirements where these may be found. The CAA is also committed to ensuring that rules are applied in a proportionate manner and this is the basis both of our ESP and our approach to the regulatory review of recreational aviation. The CAA has been and continues to be active in trying to influence the development of the European hard and soft law material and also in considering how best to implement and/or use flexibility provisions in strictly justified circumstances. In addition, the CAA does seek to work with and seeks the views of the UK industry in developing the approach to take in rulemaking tasks, and will seek ways to do more of this in the future. At the rule development stages the CAA is one of the most represented authorities on rulemaking groups. Furthermore, the CAA continues to comment throughout the consultation process and support the DFT in its negotiations with the Commission and other Member States in the EASA Committee. However, other Member States, and industry representatives also have a voice and the finished rules may reflect a compromise. Voting at the EASA Committee is by qualified majority voting and no single Member state has a veto. There are some examples of where the CAA has worked effectively to minimise the regulatory burden of new European requirements. One such example is as follows: During the	We agree. The CAA is committed to ensuring that there is no "gold-plating" of EASA requirements and will remove any such additional requirements where these may be found. A "gold-plate" review team has been established, Chaired by Industry, for just this purpose. The CAA is also committed to ensuring that rules are applied in a proportionate manner and this is the basis both of our ESP and our approach to the regulatory review of recreational aviation. The CAA will continue to engage with EU/EASA on all rule developments both on specific initiatives affecting the GA community (e.g. SPO) and on overall approach to EU/EASA rulemaking. Next key activities are meetings of i) RAG on 3 July when we will comment on the rulemaking programme for 2014-2017; on regulatory challenges for 2013-2023; put forward a UK paper on the need for removing/reviewing existing rules and ask specifically about how to engage more actively in progressing the recommendations of the GA Safety strategy review; ii) EASA Committee 10-12 July when we will advise DFT, among other topics, on proportionality etc of proposals on Part SPO and A-A operations; on the need to have effective use of flexibility provisions and on regulatory challenges for 2013-2023. The CAA continues to apply its best efforts to influence Europe to develop and publish rules that are proportionate and appropriate. The CAA has started its own initiative to review the regulation of all aspects of recreational aviation. The CAA will propose changes to national regulations for nationally-regulated activities and seek to influence EASA, the Commission and other States to implement similar changes into European regulations. But this is not just a matter for the CAA. The regulated community must also engage with EASA by making its own contributions to the European rulemaking process. In this respect, co-operating with those engaged in similar activities in other European States and presenting a "European

Common Themes	9	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 active 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/FAA 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 in Jun 2013, to progress this work.	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	10	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 rulemaking groups reached different conclusions and it was not realised that the resulting rules would have an interdependency or be in conflict. Where issues are 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.	See comments on 2 and 8. 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.
Europe - Problems	11	CAA is perceived to not push back against EASA over-regulation.	See response to item 8. The CAA seeks to influence EASA and the Commission to make rules that are proportionate and "smart" – through its involvement in rule-making groups, provision of Seconded National Experts to EASA and the Commission, responding to consultations and in supporting DfT in its negotiations in the EASA Committee. 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 as 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 believe this to be a misunderstanding of the role and extent of the 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. The CAA continues to apply its best efforts to influence Europe to develop and publish rules that are proportionate and appropriate. But this is not just a matter for the CAA. The regulated community must also engage with EASA by making its own contributions to the European rulemaking process. In this respect, co-operating with those engaged in similar activities in other European States and presenting a "European industry" view, preferably through a representative body or association is likely to be the most effective approach
Europe - Problems	12	The FCL transition has meant losing lifelong privileges and pilots are expected to pay for things they didn't ask for. It also invalidates FAA piggyback licences.	The move to a harmonised European licensing system 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. Wherever 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-ARA has imposed a new prefix for UK licence serial numbers, (GBR in place of UK), which may mean that FAA licences issued on the basis of UK 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 UK (and other EU Member State) issued Part-FCL licences in the US and vice versa. This may render these so-called piggyback licences redundant to the benefit of the pilots.	The CAA recognises that National licences originally issued with a lifetime validity have been superseded 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 as a 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 bi-lateral arrangement 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.
Europe - Problems	13	English language proficiency requirement has been made bureaucratic considering how many native speakers there are in the UK. Many are unknowingly placed on level four and so breaking rules on radios.	The CAA has sought to minimise the bureaucracy related to this requirement, which does have its basis in safety, and make it as easy as practicable for native speakers to obtain their Level 6 proficiency. It is recognised that we have not communicated well on this issue and we have taken steps to improve guidance and advice to pilots. The English language proficiency requirement is an ICAO Standard. 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 tenable for the CAA to treat applicants differently depending upon nationality or ethnic origin; 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 clearly fluent and understandable in English as Level 6 - which is the highest level and is valid for life. This assessment may be conducted during any practical test, or as an aviation-related	We disagree and believe that the CAA has already interpreted the regulations in the most flexible manner possible. Full information on the subject and the acceptable means of compliance has been published. The CAA has already taken as full advantage as it can of the fact that most UK examiners are native English speakers.
Europe - Problems	14	The division between Annex I and Annex II aircraft is seemingly arbitrary and not based on the amount of skill required to fly the planes.	This division is based solely upon the airworthiness provenance of the aircraft. In drawing up the EASA Basic Regulation regulators decided that it was not proportionate or practical to bring all aircraft within its scope. Those listed in Annex II include aircraft that are not supported to ICAO-Annex 8 standards and Microlight, homebuilt and other aircraft for which there were no common standards that EASA could adopt across Europe. Consequently, the decision was taken to leave these aircraft under national rules. Thus, the distinction between Annex II and EASA aircraft was made of necessity based upon airworthiness considerations. Because this distinction is made in the top level legislation, it also applies to the subordinate licensing rules.	We disagree that the distinction between Annex II and EASA aircraft is arbitrary; this is clearly defined in the Basic Regulation. We believe that a misunderstanding exists in respect of FCL requirements and airworthiness classifications. The CAA has already amended UK legislation so that European pilot licences are valid for UK nationally-regulated Annex II aeroplanes, avoiding as far as possible the need for pilots to hold both European and national licences.

Europe - Problems	15	CAA has not done enough to explain the EASA transition to people.	<p>The CAA has gone to some lengths to explain the transitional processes to its industry. However, it is evident that we can and should do more to help industry to 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 registered training facilities understand the changes that will affect them.</p> <p>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.</p> <p>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 texts not being made available until very shortly before they come into force. Where possible the CAA has published information in advance of the final text 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</p>	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 treat Light Sport Aircraft under EASA PtF as a Group A aircraft, leading to excessive requirements when they are meant to be regulated lightly.	<p>Although Light Sport Aircraft are EASA types, as 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 of BCAR A (CAP 553) 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.</p>	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.	<p>The CAA has sought to make sure that the introduction of this new rating is as simple and as cheap as possible but will review its current approach to see if further simplification can be made.</p> <p>Prior to the implementation of the EU rules, several States already had a mandatory aerobatic rating under their national legislation. These countries influenced the inclusion 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.</p>	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.	<p>This would be a political decision, but the case to do so is not clear cut as it could have a very severe 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.</p> <p>To continue to "sell" courses for European licences, schools in the UK that had left 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. Similarly, 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 their principal places of business to other EU States.</p> <p>If the UK left the EU it is likely that our own aviation community would want the UK to remain an EASA Member State.</p> <p>The 'mutual recognition' agreements established between the UK and some other EU States to allow freedom of movement of sub-</p>	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 adverse 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. One suggested that examiners should be able to check English proficiency on test flights, with fluency assumed as default. Others questioned why ICAO English requirements meant for CAT were being applied to UK GA, which often lack radios.	<p>See also item 13.</p> <p>Examiners are already authorised to certify Level 6 Language Proficiency to pilots who are fluent.</p> <p>If a pilot is only going to fly non-radio, language proficiency is not required. However, few pilots choose to apply for a licence that is valid "non-radio" only.</p>	We disagree. 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 FRTOL test.	<p>See also items 13 and 20.</p> <p>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.</p> <p>Repeat of answer above:</p> <p>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 tenable for the CAA to treat applicants differently depending upon nationality or ethnic origin; 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</p>	We disagree. This is adequately covered by extant regulation.

Europe - Suggestions	22	The CAA should seek to take gliding out of EASA since the BGA clearly regulated well. At least move them to Annex II.	Gliders above a certain weight were brought within scope of the EASA Basic Regulation when it was originally negotiated by co-decision involving Member States and the European Parliament. The BGA was never the regulator for gliding in the UK. Prior to EASA, gliding in the UK was unregulated; while most participants decided to operate within the BGA system, there was no compulsion to do so and some did not. Gliding at that time was regulated in many Member States who considered that this assured the safety of the activity and the UK was unable to convince them that a removal of such regulation would be acceptable. The safety of gliding in the UK with respect to airworthiness has benefited greatly from the fact that the majority of gliders used in the UK were designed and manufactured in other European States where the design and manufacture has been subject to formal regulation in accordance with JAR22/CS22 for many years. It could be argued that were it not for this the UK would have been forced to bring gliders in to the scope of regulation some time ago. In respect of pilot licensing, the CAA would be content for gliding to continue within the UK as an unlicensed activity, but other countries are insistent that licensing (which they have always had) should be used as we have sought to use these as much as possible. For example, in the area of pilot licensing the CAA has made the maximum use of the grandfather rights permitted by EU legislation. i.e. National commercial licences remain valid until 2014; national aeroplane licences for private flying remain valid until 2015. Conversion criteria for all national qualifications, including for balloons and gliders, have been developed and agreed. Conversion terms for UK IMC Ratings obtained prior to 8th April 2014 have been agreed and implemented.	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 extant glider pilot certification regime and will seek to ensure that the introduction of these new licensing requirements is as simple and cost effective as possible.
Europe - Suggestions	23	Should be greater use of grandfather rights during transition.	The CAA would welcome suggestions of where more grandfather rights could be used as we have sought to use these as much as possible. For example, in the area of pilot licensing the CAA has made the maximum use of the grandfather rights permitted by EU legislation. i.e. National commercial licences remain valid until 2014; national aeroplane licences for private flying remain valid until 2015. Conversion criteria for all national qualifications, including for balloons and gliders, have been developed and agreed. Conversion terms for UK IMC Ratings obtained prior to 8th April 2014 have been agreed and implemented.	We agree. The CAA has and will continue to make the maximum use of such provisions. It is believed that the commenters have misunderstood. The EU regulations allow privileges previously exercised by individuals to be maintained for those individuals "as far as is practicable" and the CAA has made use of these provisions to facilitate this. However, the EU regulations do not allow national rules to continue to be applied into the future to the extent that new applicants may continue to obtain and use national qualifications after the transition period ends.
Europe - Suggestions	24	CAA should publish more data on the pace of transition.	We have published extensive information regarding what has to be complied with and by when, and would welcome suggestions of where more information and clarity could be helpful.	Agree. See item 15
Europe - Suggestions	25	EASA should not regulate gliders flying near cloud.	EASA is addressing the needs of the glider community in this regard through a rulemaking group (FCL.008) and has issued the resulting Opinion 03/2013 which addresses these concerns in a way that we understand is acceptable to the BGA. A consequence of gliders and glider pilots becoming subject to regulation is that the rules for flying in the vicinity of clouds become applicable. Such rules have been in force for every other type of aircraft since the requirement was first written in to the ICAO Standards many decades ago and indeed have been applied to gliders flying throughout most of Europe.	We disagree. The CAA, in conjunction with the BGA, has contributed to the development of the Glider Cloud Flying Rating which will permit gliders to operate in and close to cloud without the pilot requiring to hold an Instrument Rating. This matter has been the subject of a recent EASA rulemaking programme with significant participation by bodies representing gliding and full public consultation.
Europe - Suggestions	26	Additional GA regulations should have clear safety rationale, not for harmonisation.	A European General Aviation Safety Strategy has been developed as a result of a review established by the EASA Management Board, which issued a report and made recommendations in August 2012. This sets a clear safety rationale for regulating GA. The Commission and EASA have established a roadmap for actions and is reporting progress at the EASA MB meeting on 5 June 2013. The UK members of the Board will be supported by the newly appointed CAA GA Programme manager as an expert adviser; he will engage fully with this initiative in his post.	We agree. The CAA is actively engaged with EASA to ensure GA regulation is proportionate to the safety risk and that associated harmonisation aspects take account of this. The CAA has initiated its own programme for national regulation of recreational aviation and will support the European work on the new General Aviation Safety Strategy
Europe - Suggestions	27	CAA should not seek to implement new EASA regulations before learning from others' best practice.	The CAA does seek to implement new European regulations in a pragmatic and practicable way and does 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, whilst 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. For Licensing, the UK has more licence holders and more training schools than any other State. The legislation imposes hard deadlines for licence and organisation conversion to EU rules. Because we must finish on time and we have by far the highest volume of conversions to do, we had to start as early as practicable. This was only 6 months before the mandatory date of commencement (8/4/13) set out in the legislation.	We disagree. The UK has no discretion other than to implement EU Regulation; this principle applies not only to the aviation sector. However, the CAA will ensure its full participation and influence in the regulatory development process, and also to consult with industry and take maximum advantage of derogation opportunities where appropriate. In some areas the UK has had to begin implementation as soon as practicable because of the large volumes and the statutory end dates. The CAA meets regularly with EASA and the other Member States to share best practice. As an example, the CAA has developed new Alternative Acceptable Means of Compliance for the conversion or licences issued outside the EU that is derived from a proposal made by the Norwegian CAA.
Europe - Suggestions	28	Allow free GA circulation in and out of Europe.	It would be helpful to understand more of the background to this comment. It is believed to relate to the new requirement for pilots of 3rd country aircraft based in Europe to hold EASA licences or to have their foreign licences validated. The introduction of this rule was an action of the Commission to ensure European safety standards apply within the EU. Outside of the ICAO/EASA system GA has freedom to circulate within countries subject to prior permission or by taking advantage of pre-existing bi-lateral agreements.	We believe there to be a misunderstanding. A guiding principle, as defined by EU Regulations, is to permit the free movements of goods services and people within Europe. EASA regulations achieve this. Outside of the ICAO/EASA system GA has freedom to circulate within countries subject to prior permission or by taking advantage of pre-existing bi-lateral agreements.
Europe - Suggestions	29	Calls for a review of EASA performance.	Article 62 of the EASA Basic regulation requires the EASA Management Board every 5 years to commission an independent evaluation of the implementation of the Regulation which should examine amongst other things how effectively the Agency is fulfilling its mission. The second such evaluation is currently underway; an independent panel has been set up to carry out the evaluation and will make its final report and recommendations to the Board in December 2013. The CAA and DfT have submitted a joint set of comments to the panel.	We are unable to comment. This subject is beyond the direct remit of the CAA. However, we note that this suggestion is already 'built-in' to the European Legislation.
Europe - Suggestions	30	Licence switch over should be done at minimal cost to licence holders.	The CAA has sought to ensure that the fees for the switch to EASA licences properly reflects the costs of checking compliance and issuing the licences. For example, there is only one charge that covers the issue of a new licence and the checking and issue of all associated ratings.	We agree. Whilst the CAA has to recover its costs it is committed to ensuring that costs are minimised.
Europe - Suggestions	31	Make use of EASA and develop a Europe-wide certification process.	The EASA regulation has already established a single certification system for aircraft within its scope throughout the EU and EEA Member States; Annex II aircraft are excluded.	The UK has already supported the introduction of EASA and its principles of proportionate EU-wide certification.
Europe - Suggestions	32	Stop subsidising the CAA canteen!	The subsidy was stopped in September 2013.	We agree and have stopped the subsidy.

Civil Aviation Authority - Problems	33	Forms are multiplying and becoming aggressive and too long (e.g. new change of address form is seven pages long). They are full of colour and so waste ink.	It is accepted that some of the Forms are not suitable. These are being replaced. All colour and shading is being or has been removed from Forms. One of the objectives of the CAA's Process and Performance Improvement programme is to offer stakeholders much more input to, and ownership of, the data the CAA hold on them, such as addresses, contact details etc. On-line application processes being developed will minimise information required.	We agree and have a programme of change underway. A number of airworthiness forms are already available on-line and the first on-line licensing form went live in Septmeber 2013.
Civil Aviation Authority - Problems	34	Often CAA already has or doesn't need the data it is asking for. Perception that CAA uses lengthy forms to create work and increase compliance costs, improving its return.	The Forms ask only for information necessary to produce the licence so that Licensing Officers have all the information to hand and update the system to create the licence in the shortest possible time. If the Licensing Staff have to search through the records to find the data, the processing time will increase markedly, and pilots will be waiting longer for their licences. Nevertheless, as part of its modernisation programme, the CAA will ensure that where data has previously been supplied to the CAA, it will be verified, managed and used effectively in the processing of all pertinent transactions.	We agree and already have a programme of change underway.
Civil Aviation Authority - Problems	35	CAA gives poor customer service – often does not even respond to enquiries. It is very poor value for money.	The recent problems experienced with licence processing have been due to the sheer volume of business and associated calls and e-mails asking questions which have severely stretched the available resources. The CAA's has reviewed its processes and has implemented changes, including the introduction of The Hub, which have already delivered significant improvements in our customer service performance. More work is being done to build upon these improvements.	We agree and have a programme of change underway including introduction of customer-focussed 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.
Civil Aviation Authority - Problems	36	Fees are too high, lack transparency and have no clear rationale. £69 for name change on aircraft ownership document.	See comments on line 4.	The CAA publishes its 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.
Civil Aviation Authority - Problems	37	Charges lack proportionality.	See comments on line 4.	The CAA publishes its 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.
Civil Aviation Authority - Problems	38	CAA does not show any flexibility and simply returns forms without ringing up to solve minor issues. It will not prioritise applications even when it has been returned due to CAA mistake.	Applicants are responsible for ensuring that their application is complete and complies with the requirements. It is not practical or cost efficient for CAA staff to seek out missing or incorrect information. The returning of incorrect or incomplete form is common practice (e.g. passport office). The CAA is investing in more efficient online-based application processes which should assist the applicant and reduce the scope for errors to be made.	We agree and have a programme of change underway including introduction of customer-focussed information centre and associated IT-based transaction system.
Civil Aviation Authority - Problems	39	CAA surveyors often have different interpretations, causing decisions to be changed and adding work for compliance.	The CAA will review this and seek to ensure consistent, proportionate, interpretation and implementation of requirements.	We agree. The CAA CAA is working to ensure consistent, proportionate, interpretation and implementation of requirements.
Civil Aviation Authority - Problems	40	Inexperienced staff do not understand regulatory details and approach GA like CAT.	See item 39.	We agree. The CAA is establishing a new GA Unit, dedicated to the task of GA regulation, staffed by individuals with experience and knowledge appropriate to the GA sector. In addition the CAA is working to ensure consistent, proportionate, interpretation and implementation of requirements.
Civil Aviation Authority - Problems	41	Processes are long, inefficient, opaque and confusing. It takes a long time to have a licence processed, maintenance organisation approved, etc.	The CAA has recognised this problem and has implemented wide-ranging programmes such as Process and Performance Improvement and Business Process Re-engineering to address them. Improvements have already been realised in some areas. The CAA will provide details of these improvements and of future plans to further improve our services.	We agree and have a programme of change underway including introduction of customer-focussed information centre and associated IT-based transaction system.
Civil Aviation Authority - Problems	42	Perception that CAA is monopolistic and views industry as captive source of revenue rather than customer.	The CAA has a legal obligation, placed on it by the Government, to cover its costs and make a return on investment. Several initiatives are under way to make the CAA more efficient and reduce costs.	See items 4 & 5
Civil Aviation Authority - Problems	43	Users feel they have no input in how the CAA deals with things.	The CAA consults both formally and informally with industry stakeholders via a number of channels. In particular the CAA works continually with industry representative bodies who provide input and feedback on behalf of their membership which, together, comprise a large proportion of the GA community. Nevertheless, it is recognised that more could be done in this area and the CAA will review the options to engage more widely with industry.	We agree. It is recognised that more could be done in this area; the CAA will review options to engage more widely with industry. The CAA will seek to improve the effectiveness of the various consultative groups
Civil Aviation Authority - Problems	44	Bureaucracy is seen to continually increase without increasing safety.	See item 1.	We agree. See item 1.
Civil Aviation Authority - Problems	45	CAA has a focus on systemising procedures rather than pragmatic safety.	The CAA's objectives as set out in the Safety Plan are to influence rules and take actions to deliver targeted safety outcomes, promoting higher safety performance. The CAA's processes are being refined to enable that objective to be executed more effectively and efficiently.	We agree. The CAA is committed to the principles of risk-based Intervention as evidenced in its Safety Plan. See also items 1 & 2.
Civil Aviation Authority - Problems	46	CAA bases examiner fees on what they think examiners will earn, not actual cost of approving the examiner. Several accusations of cronyism in this area.	See comments on 4.	See item 4 The CAA is currently reviewing the whole subject of examiner test allocation, test booking and associated fees. Industry will be consulted upon the changes arising from this work before any changes are introduced.
Civil Aviation Authority - Problems	47	When issues are raised, such as poor maintenance standards, perception that CAA does not carry out adequate enforcement.	The CAA's policy is to investigate all allegations of breaches of the ANO that can be substantiated. The CAA has recognised the need to be more transparent about its enforcement action and work is in hand to ensure this transparency. Ultimately the CAA must make a decision about whether it is in the public interest to progress an investigation and the nature of the information supplied may influence this decision.	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 in hand to ensure transparency, both of the CAA's enforcement policy, and of the application of the policy.
Civil Aviation Authority - Problems	48	CAA is 'institutionally arrogant'	The CAA fully recognises that as a Regulator it must always act in the best interests of those that it regulates and in a manner which achieves the necessary level of engagement. Where it fails to do this, the resultant perception is disproportionately greater than would be the case in a commercial environment. Maintaining engagement with Stakeholders is core to the joint ability to deliver safety outcomes and the CAA must take seriously all such criticisms and ensure that these are addressed in such a manner as to retain and build the necessary element of trust.	In order to better understand the background to this comment, the CAA would welcome specific examples in order to address such concerns.

Civil Aviation Authority - Problems	49	It is not appropriate for CAA to both set the rules and prosecute.	See item 5.T The CAA does not set the rules. The majority of rules the breach of which could result in prosecution are put in place either by the UK government (UK Air Navigation Order), or by the European rulemaking procedures. The CAA prosecutes a very small number of serious offenders and only when the public interest is served by doing so. In most cases any CAA action is focussed on improving pilot performance, by education, re-training or licensing action. The CAA has recognised the need to be more transparent about its enforcement action and work is in hand to ensure this transparency.	See item 5. There appears to be a misunderstanding here. The CAA is developing better information regarding enforcement policy
Civil Aviation Authority - Problems	50	CAA does not need a medical department.	European law requires the CAA to have the expertise and staff to approve and provide ongoing regulation of AeroMedical Centres and AeroMedical 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 Section, 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/control. 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 rapid return to flying/controlling after illness and to ensure their health is maintained. It also provides a service for initial Class 1 applicants who self-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, and 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.
Civil Aviation Authority - Suggestions	51	Remove the requirement for CAA to make 6% ROI.	This is for the DfT to consider and the CAA will be happy to work with the DfT in responding to this item.	See item 4
Civil Aviation Authority - Suggestions	52	CAA could just use standard EASA forms, which are simpler than CAA ones.	EASA has produced standard forms for only a few of the transactions that have to be made, and these forms do not include the legal and financial aspects that need to be addressed.	This is for the Government to decide. 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 its own forms and introducing on-line application processes. See item 33. The CAA has a programme of work in progress to address this issue.
Civil Aviation Authority - Suggestions	53	Staff should be obliged to give their names and there should be a formal complaints procedure.	The CAA has recognised the need for a formal complaints procedure and work is in hand to introduce 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=detail&nid=2278
Civil Aviation Authority - Suggestions	54	Many suggested moving to online system so that people can print off licences, permits, certificates etc. This would also speed up applications and reduce cost.	The CAA is moving towards on-line application and payment processes which will benefit industry. However, UK and EU legislation stipulates that only the CAA may issue certificates and licences. Licences are printed on paper that is designed to prevent falsification. Attempts to alter/falsify licences and other certificates are not uncommon. Therefore it is not seen as being feasible at this time to allow applicants themselves to undertake the printing of official documents such as licences, certificates, permissions etc. However, the Process and Performance Improvement initiative currently under way is looking at ways of using electronic signatures for certain documents such as exemptions.	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 ICAO partners investigating opportunities for centralisation of aviation records.
Civil Aviation Authority - Suggestions	55	Many suggested that CAA should improve its website to make information easier to find.	The CAA agrees with this suggestion and work is already underway to re-design the website. This activity is taking place alongside other initiatives to introduce online transactions (applications, payments etc.).	We agree. Work is already underway to re-design the website. This activity is taking place alongside other initiatives to introduce online transactions (applications, payments etc.).
Civil Aviation Authority - Suggestions	56	CAA should issue temporary permits/licences/certificates for immediate use before receiving full document.	This is permitted under the EU regulations, and consideration will be given to introduce this facility where there are clear benefits to be gained.	We agree. Consideration will be given to introduce this facility where permitted by EU Regulation and where clear benefits exist. In general there is only commercial urgency for commercial pilots flying with airlines. 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 delays 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.
Civil Aviation Authority - Suggestions	57	CAA could send out text or email updates so that people don't feel the need to call so much.	This additional service is already being considered through existing IT projects and as part of the establishment of online transactions. A substantial data gathering exercise is required as the CAA does not currently hold email addresses and mobile phone numbers for very many of the pilots, aircraft owners, engineers etc.	We agree. The CAA has started to introduce a customer relations management system. The initial phase of this was introduced in September 2013 and in due course this system will allow customers access to track progress of their applications within the CAA.
Civil Aviation Authority - Suggestions	58	CAA should simplify and automate procedures for currency and revalidation to make them less confusing and complex.	The CAA will review the procedures to eliminate unnecessary bureaucracy.	We will consider this item as a potential additional service within existing IT projects and as part of the establishment of online transactions.
Civil Aviation Authority - Suggestions	59	Forms should be reduced wherever possible e.g. a single form for one licence application.	The CAA is now moving to introduce on-line forms and it is expected that the transfer to online transactions should largely alleviate this concern.	We agree. See item 33.
Civil Aviation Authority - Suggestions	60	CAA should move somewhere cheaper to lower its cost base.	The most significant cost to the CAA is staff salaries which have already been benchmarked against industry equivalents. Moving the office location is not thought to result in any significant cost reduction.	We disagree. The most significant cost to the CAA is staff salaries which have already been benchmarked against industry equivalents. Moving the office location is not thought to result in any significant cost reduction.
Civil Aviation Authority - Suggestions	61	CAA should use FAA as a model for regulation/administration.	It would be helpful to have more detail from the commenter on this issue to ensure we respond to the root cause of the comment.	We would appreciate more information.
Civil Aviation Authority - Suggestions	62	Some felt that there should be some clear principles set out by which the CAA must work and against which it will be held to account. Some suggested there should be some kind of independent ombudsman.	The appointment of an independent ombudsman is a decision for UK government. European Regulations specify 'Authority Requirements' which define precisely the responsibilities of the National Authorities and how they carry out their functions. The CAA is audited regularly by both ICAO and EASA.	The CAA is bound and held to account by requirements from the UK Government, the EU, EASA, and ICAO.
Civil Aviation Authority - Suggestions	63	CAA should have requirement to promote GA (e.g. support ways of reducing noise, not discouraging silencers through regulations).	The CAA has recognised the need to ensure that GA is regulated in a proportionate manner and has established a workstream known as RA2, and has appointed a GA Programme Manager.	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.

Civil Aviation Authority - Suggestions	64	CAA should be clearer about upcoming 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 BCAR; for General Aviation Airworthiness for owners, engineers and approved organisations.	We agree. See item 15
Civil Aviation Authority - Suggestions	65	CAA should perform its own internal review to identify candidates for relaxed regulation, as was successfully done with unlicensed airfields.	In 2012 the CAA carried out a Regulatory Review of Recreational Aviation (RA2) 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 objectives 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 recreational 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 cooperation with EASA 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 have, as one of its objectives, the managed deregulation of the sector wherever it is agreed with industry and other key stakeholders that such deregulation is appropriate.
Civil Aviation Authority - Suggestions	66	CAA could send out email warnings when ratings etc are due to expire.	The CAA is considering providing such a service as part of the development of new electronic and on-line systems, however, there are a considerable number of licenses and ratings in existence and to send a notification for every impending expiry may be impractical.	See item 57. The sheer volumes, and delays in receiving 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 influence.	The European General Aviation Safety Strategy will address the regulatory needs of stakeholders, but does recognise the need to amend existing rules in order to be more proportionate etc. In itself this will mean further changes, but with buy-in 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 Regulations in due course.
General - Problems	69	Changes such as EASA transition are confusing and have not been adequate explained.	See comment on 64	See item 64
General - Problems	70	Each tier of regulation (LAA, CAA, EASA) adds to the previous rather than replacing, meaning that there is a complex series of overlaps.	In a number of areas the CAA has opted to maintain some of the previous rules in order to preserve privileges and ensure that UK pilots, aircraft owners etc. are not disadvantaged. The CAA is looking at ways to clean up the arrangement of the rules and has recognised that during the transition from UK National legislation to EU legislation some aspects will appear confusing. The Airworthiness regulatory framework, which has already been implemented for some time, is designed and constructed so that in fact each tier complements and links in without introducing additional burdens. Examples of this are found throughout the requirements for organisational approvals as the UK national framework generally is designed to easily 'bolt-on' to an EASA approval, thereby reducing the compliance demonstration burden to organisations that elect to hold dual EASA and CAA approvals An example of complementary requirements at the Permit to Fly level is that the LAA 'fleet' is maintained in accordance with LAA procedures, recognised by the CAA, that are compliant with the CAA BCAR A3-7 requirements for continuing airworthiness of Permit to Fly aeroplanes, thereby ensuring that all Permit to Fly aircraft comply with a common standard.	We disagree. Implementation of EASA Regulation by definition supersedes extant UK 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 coordination 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 wind farm 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 between permit to fly and C of A, leading to a dual system light sport aircraft and bigger GA with nothing in between. This is due to regulation.	EASA recognises the way in which certification standards and specifications have developed since 2005 and have acknowledged the need for a restricted Type Certificate and restricted Certificate of Airworthiness to recognise a level of airworthiness which is above a permit to fly and below a full Certificate of Airworthiness. 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.	We agree. The CAA is committed to identify appropriate intermediary certification procedures to better accommodate the range of aircraft requirements.
General - Problems	73	Perceived bias against FAA licences and N-regs.	European law in this area is seeking to ensure that all pilots flying in EU airspace achieve European or equivalent safety standards. The European Commission is working with officials in the US to develop a licensing appendix to the current BASA.	We agree. The CAA will continue to work with EASA and our European colleagues to ensure proportionate oversight of third country operations where appropriate.
General - Suggestions	74	Allow GA to do micro-commercial work.	This suggestion was identified in a review of recreational aviation carried out by the CAA in 2012. 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 extant 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 - Suggestions	75	Shift focus of regulations to what cannot be done, not what may be done.	Where possible the CAA takes this approach. However, European legislation typically takes the opposite perspective to UK and specifies permitted activities rather than prohibited activities. The CAA will work with the industry to help clarify requirements and provide suitable advice and guidance.	We believe this is a misunderstanding. There is a balance to be drawn between the two styles depending on the level of risk. The CAA is committed to continually reviewing legislation for appropriateness and proportionality.
General - Suggestions	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 CAA's new 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 - Suggestions	77	Operators who have passed CAA assessment (pilots, trainers, examiners etc) should be trusted more and not charged for everything they do.	See also item 6. With the new EASA rules 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 - Suggestions	78	Encourage mentoring of new pilots, maybe via CRIs.	Various industry organisations such as the Light Aircraft Association, the British Gliding Association, the Aircraft Owners and Pilots Association and independent flying schools have already developed such schemes and the CAA supports this approach.	We agree. The CAA fully recognises the safety benefits of reaching and maintaining necessary levels of competency and will commit to investigating opportunities to achieve this in concert with stakeholders. The CAA is very supportive of the regulated community taking a lead in initiatives such as this.
General - Suggestions	79	No point in renewing radio licences for aircraft each year.	Radio licences are subject to a three-year renewal period.	We believe this is a misunderstanding. Transition to three year aircraft radio licences was introduced in 2012.

General - Suggestions	80	The systems for submitting flight-plans should be simpler and more flexible.	The CAA acknowledges this and is 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 NATS in the development and deployment of improved flight plan procedures.
General - Suggestions	81	CAA and EASA should disengage from light aircraft (e.g. below 2000kgs). Licence the pilots and engineers then let 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 continuing airworthiness management organisation and within all these regimes a significant amount of work is allowed to be performed by the Pilot/Owner. The new European Light Aircraft (ELA) regulations provide a much reduced regulatory regime for aircraft up to 2,000kg	We partially agree. Oversight of aviation safety remains the responsibility of EASA and NAAs. However the CAA are engaged with EASA, our EU colleagues, and industry to develop and introduce a more proportionate regulatory environment for recreational aviation. In addition, the CAA is very supportive of Qualified Entities taking on the responsibility for oversight and regulation where this will be beneficial and cost effective to the industry.
General - Suggestions	82	Devolve more functions to the associations.	The CAA is keen to devolve functions to industry and this is constantly reviewed by the CAA. There is scope for organisations to become national Qualified Entities and so find compliance with the requirements and recommend that the CAA issues the approval/licence. The BMAA already does this for microlight pilot licences. The CAA is receptive to other bodies wishing to take on devolved powers provided that they are able to demonstrate the objective/independence criteria. The CAA is nearly at the point of finalising a new suite of airworthiness organisational approval requirements to the fully recognise 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. It is expected that this will result in a substantial reduction in CAA regulatory oversight.	We agree. The CAA is receptive to member associations taking on delegated powers as Qualified Entities and is developing a new suite of airworthiness organisational approval requirements. The CAA already delegates where possible and appropriate, and is willing to do more where there is an industry appetite to take on such responsibility.
General - Suggestions	83	Cancel proposed changes to radio frequency spacing (833). GA are paying for things they haven't asked for.	We are not able to unilaterally avoid implementation of 8.33KHz channel spacing.	CAA will provide for maximum transition period to the mandatory carriage of 8.33KHz and are working to ease the approval process to assist greater take-up of 8.33 capable hand-held radios.
General - Suggestions	84	Proposal for Great Thames Aerial Cavalcade – fleet of microlights flying down the Thames. Supported by everyone but CAA.	Single-engined aircraft are not permitted to fly over the congested area of London. The CAA informed the proposer that the event could be held if the river could be closed to other traffic for the duration of the flight so that third parties were not put at risk in the event of the failure of a single-engine microlight. The proposer was not able to arrange that.	We believe this is a misunderstanding. The organiser was unable to arrange the appropriate risk mitigation actions proposed by the CAA.
General - Suggestions	85	Allow charity flights in permit to fly aircraft. Relax rules on charity flights more generally.	This suggestion was identified in a review of recreational aviation carried out by the CAA in 2012. The CAA's GA programme aims to tackle this.	We agree. This recommendation was identified in the RA2 study and will be addressed by the CAA as part of the programme.
General - Suggestions	86	CAA should delegate as much regulation of gliders as possible to the BGA.	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 CAMO and an ATO.	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 CAMO and an ATO. It is the BGA's choice to become an Approved Training Organisation for pilot training, which disqualifies them from being part of the regulator as a Qualified Entity
Maintenance - Problems	87	The CAMO system is too expensive and poorly monitored.	The charges levied by Continuing Airworthiness Management Organisations do vary and are not directly related to (and therefore influenced by) the charges from UK CAA Scheme of Charges. The EASA GA Task Force is considering the introduction of more proportional requirements that are aimed, amongst other things, at the cost of compliance. In terms of monitoring, the CAA is implementing a risk-based oversight programme to ensure a proportionate level of oversight.	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	88	CAA engineering inspectors sometimes seem to lack sufficient knowledge and experience.	A rotation of surveyors allocated to regulated companies is promoted within the regional offices, to ensure fresh oversight of company approvals. UK CAA recruits high calibre surveyors with industry recognised qualifications and relevant experience in their fields. New staff with a knowledge, or experience gap are trained, mentored and exposed to appropriate levels of GA activities to develop their competencies.	Part of Airworthiness AE&S continuous improvement standardisation strategy.
Maintenance - Problems	89	Introduction of LAMP scheme increased costs by £500 due to paperwork compared to old CAA system.	The Light Aircraft maintenance programme (LAMP) scheme was introduced in 2007 for EASA aircraft and was a development of the CAA Light Aircraft Maintenance Schedule (LAMS), which was first introduced in 1978. The technical content of the LAMP is unchanged from the LAMS. Only the introductory section was revised to ensure it met the requirements of EASA part-M. The CAA is therefore unsure as to how this has directly resulted in increasing costs when compared to the old CAA LAMS system. The EASA GA Task Force has made proposals for simplified maintenance programmes which may result in reduced maintenance costs.	There has been no change in the technical requirements and, from a regulatory perspective, LAMP should not increase paperwork complexity vs. LAMS. We believe this is a commercial matter.
Maintenance - Problems	90	Perception that CAA fees increase yet visits are fewer and lesser 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. It is envisaged that audits will be more safety focussed and value added. Whilst compliance audits will never be completely replaced, it is our intention to move to a system where the overall safety performance is measured and will result in regulatory oversight that is commensurate to the safety risk.	See item 4. The CAA publishes its 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.
Maintenance - Problems	91	Part M is too bureaucratic and offers no benefit. Requires four designated people where M3 needed one. Increases paperwork, not safety. The need to list every type for Part M is excessive and adding more costs a lot.	Part M Subparts F and G approvals may be granted to organisations consisting of a minimum of 2 people. Part M also contains a provision for licensed maintenance personnel to both maintain and recommend the renewal of Airworthiness Review Certificates (ARC's) without holding an organisation approval. These basic provisions described above apply to most small light aircraft encompassed within the EASA regulatory framework. With regard to aircraft type listings within part M approvals, the EASA GA Task Force is reviewing the way in which organisation type capability is described.	Misunderstanding of current system but we will continue to influence and comment on EASA GA Task Force proposals for ongoing development of requirements.
Maintenance - Problems	92	Part M introduces regular fees for each approved type, but the planes are simple and have very few differences, so fees are just admin taxes.	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.	Influencing and commenting on EASA GA Task Force proposals.

Maintenance - Problems	93	CAA is changing Annex II maintenance procedures for no apparent reason (CofA to National Airworthiness Review Certificate)	The change from an expiring UK CofA to an EASA style non expiring CofA with a National Airworthiness Review Certificate (NARC) was made following a request from industry for the National system to be similar to the EASA 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 (A8-23, A8-24 and A8-25) are intended to reduce the burden on industry where they maintain both EASA and non-EASA types by harmonising the procedures used to underpin the airworthiness review processes.	Misunderstanding of current recently introduced system.
Maintenance - Problems	94	Safety Management Systems are excessive for GA, or at least CAA's interpretation of it.	This topic is subject to review by the EASA 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 to ensure a proportionate and practicable approach to SMS is taken within the GA sector.
Maintenance - Problems	95	CAA requires components to be replaced according to manufacturer's guidelines, not actual wear and tear.	For EASA aircraft it has been recognised that the current requirements for maintenance programmes may be too restrictive. EASA Notice of Proposed Amendment (NPA) 2012-17 has proposed substantial alleviations for privately operated aircraft. It is expected that the regulations may be revised in 2014.	Awaiting revised EASA requirements in 2014.
Maintenance - Problems	96	The process to get an EASA PTF is slow and expensive. Annex II systems works fine so some questioned the rationale for change.	EASA recognise the Permit to Fly process could be improved by expanding the privileges granted to Continuing Airworthiness Management Organisations (CAMO's). Provision has been made in the EASA 2014-2017 rulemaking plan to review this process.	Influencing and possible participation in elements of EASA rulemaking plan provisioned to review this process.
Maintenance - Problems	97	EASA regulations mean CofA people can't do their own maintenance any more. CofA is becoming too expensive and it can be difficult to find licensed organisations willing to take things on.	EASA Regulations allow for pilot owner maintenance, the detail can be found in Appendix VIII to Part M (Commission Regulation (EC) No 2042/2003). The concept of the pilot owner maintenance is based on the competence of the individual and is task based. It also remains acceptable for private owners to work on their own aircraft under the supervision of a licensed engineer.	No further action required.
Maintenance - Problems	98	What were airworthiness notices replaced with?	Airworthiness Notices (CAP 455) were withdrawn in April 2009. Each Airworthiness Notice was assessed and either cancelled or relocated. The final revision of CAP 455 remains available on the CAA publications web page. It includes a list of each AN Number, Title, Date and destination.	No further action required.
Maintenance - Problems	99	EASA regulations will put off people volunteering to be DGA maintenance inspectors.	On the assumption that DGA should read BGA, the system in place today with regard to Gliding Inspectors is largely unchanged from the day when gliding was managed by the BGA outside the EASA framework.	No further action required.
Maintenance - Problems	100	Plan to change Annex II under UK CofA to EASA ARC-style system is not good.	The change from an expiring UK CofA to an EASA style non expiring CofA with a National Airworthiness Review Certificate (NARC) was made following a request from industry for the National system to be similar to the EASA 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 (A8-23, A8-24 and A8-25) are intended to reduce the burden on industry where they maintain both EASA and non-EASA types by harmonising the procedures used to underpin the airworthiness review processes.	Subject of misunderstanding of current recently introduced system.
Maintenance - Problems	101	Previously a licensed aircraft engineer could authorise a single flight for purpose of moving an aircraft to maintenance base. Now need to get temporary PTF through expensive and bureaucratic process.	We recognise that the EASA Permit system, especially when required to be used for moving an aircraft for maintenance requirements (with no mandatory tasks or design related issues), is not proportional for the majority of the aircraft involved. EASA also recognise the Permit to Fly process could be improved by expanding the privileges granted to Continuing Airworthiness Management Organisations (CAMO's). Provision has been made in the EASA 2014-2017 rulemaking plan to review this process.	Influencing and possible participation in elements of EASA rulemaking plan provisioned to review this process.
Maintenance - Problems	102	Carburettor de-icing solutions have to be approved for each aircraft type, meaning a simple issue is a life-threatening problem due to bureaucracy.	The approval of a carburettor de-icing modification is really no different in process than that for any other aircraft or engine modification. It may be possible that if a modification is approved for a particular engine then this can be utilised on a number of aircraft types but it will also be dependent on the engine installation details as to whether there is similarity of design. The CAA is planning to review our process of approving modifications for nationally-regulated aircraft and changes with a view to simplifying certain types of modifications and we will look at the subject of carburettor de-icing modifications as part of that process to see if there is a way this subject could benefit from a more streamlined process of certification.	A collaborative review of the national modification process is planned in 2013, with results to be published in 2014.
Maintenance - Problems	103	EASA is happy for certain engines to use mogas (UL95) but CAA won't allow it.	Within CAP747 in the Chapter containing Generic Concessions, numbers 2 to 5 inclusive contain explicit details on where we do in fact allow the use of MOGAS on certain light aircraft and microlights.	No further action required.
Maintenance - Problems	104	CAA won't allow mogas with ethanol in it, the alternative is very hard to find. But microlights can use it. Why?	The CAA has approved some aircraft to use MOGAS containing Ethanol where the manufacturer has determined acceptability. In practice it can be difficult for the manufacturer to approve an aircraft's complete fuel system especially in the case of older designs. The airworthiness standards for microlights do not require any certification of the engines/propellers. The slow stalling speeds and mass limits for microlights lead to a short landing distances. Consequently, engine failure and forced landing in a microlight should be a minor event. This is not the case for heavier aeroplanes, which is why engine certification is required and the use of fuel containing ethanol is not permitted.	No further action required.
Maintenance - Problems	105	The massive cost differential between private and commercial flight encourages things like illegal chartering – need less of a gap.	Insufficient detail to comment upon.	More information required

Maintenance - Problems	106	The requirement for microlight aircraft to comply with noise level requirements that are not applied to other aircraft makes no sense in 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 reassuring planning authorities about use of an 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.	CAA is in liaison with DfT to remove this requirement. Timescale TBD with DfT.
Maintenance - Suggestions	107	Many called for a way of voluntarily orphaning aircraft, or some way of moving to PtF from CofA.	The CAA has a process in place for allowing ICAO compliant aircraft operating on a Certificate of Airworthiness to be 'orphaned' when a Type Certificate (TC) holder or Type Responsibility Agreement (TRA) holder is no longer active. This process has been used to allow many aircraft owners to have the choice of allowing a CofA or PtF.	No further action required. This has however recently been discussed with EASA and the CAA will monitor any developments within Europe that may impact upon this subject.
Maintenance - Suggestions	108	Keep the LAMP system.	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 the finding 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 in particular the maintenance programme requirements for GA aircraft. The proposals published last year (NPA 2012-17) include a minimum inspection programme (mip) with similarities to the UK LAMP.	We are awaiting the outcome of the EASA rulemaking on GA maintenance programmes which is expected in 2014.
Maintenance - Suggestions	109	DfT/CAA should recognise that maintenance is in many cases a global industry with global competition.	Maintenance organisations approved in accordance with the EASA regulations have access to a 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 business access to the world's largest aviation markets. These agreements already benefit the UK market in enabling maintenance to be provided to non-UK registered aircraft.	No further action required.
Maintenance - Suggestions	110	Certified 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.	No further action required.
Maintenance - Suggestions	111	Allow British engineers to work on aircraft not registered in the UK.	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-66, they can freely work on any aircraft (within their license privileges) on any EASA member state register.	No further action required.
Maintenance - Suggestions	112	Once approved CAMOs should be able to devise 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)(i), to approve maintenance programmes. The possibility exists for the CAMO to develop alternative instructions (ref. M.A.302(d)). 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.	Misunderstanding re CAMO privileges to approve MP's and re replacing parts, we are awaiting the outcome of EASA rulemaking, expected in 2014.
Maintenance - Suggestions	113	Rather than seek approvals by type, CAMOs should be able to get them by broader categories (e.g. SEP below 5.7t).	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.	Awaiting outcome of EASA GA Task Force, expected in 2014.
Maintenance - Suggestions	114	Should be some way for pilots to self-maintain if they can demonstrate competence.	EASA Regulations does allow for pilot owner maintenance, the detail can be found in Appendix VIII to Part M (Commission Regulation (EC) No 2042/2003). The concept of the pilot owner maintenance is based on the competence of the individual and is 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 4, paragraph 12. It also remains acceptable for private owners to work on their own aircraft under the supervision of a licensed engineer.	No further action required.
Maintenance - Suggestions	115	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.801(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 alleviations for aircraft below 1200kgs (ELA1).	No further action required.
Maintenance - Suggestions	116	Remove the requirement for a full overhaul of engines in light aircraft used for commercial hire and reward.	Recently updated Generic Requirement 24 permits under controlled conditions the extension of certain light aircraft piston engine overhaul lives over 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 are considering changes to the requirements for non-binding 'Time Between Overhauls' (TBO's) and are looking to publish their decision before the end of 2013.	Recently introduced changes to the national requirements as explained in comment response and awaiting outcome of EASA rulemaking on Engine overhaul limits, expected in 2014.
Maintenance - Suggestions	117	Base maintenance regime on plane's purpose (private/commercial), not arbitrary CofA/PtF distinction.	Maintenance regimes 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.	No further action required.

Maintenance - Suggestions	118	Change PTF to restricted CofA so it can be allowed by other countries.	For the issue of an internationally recognised airworthiness certificate i.e. the CofA (or restricted CofA) the aircraft has to meet a set of criteria laid down under international agreement and published in ICAO Annex 8. The international criteria are defined in our National requirements (The Air Navigation Order) and EASA Part 21. If an aircraft meets the criteria then a CofA has to be issued, if not then a National Permit may be issued. The CAA cannot issue a CofA to an aircraft that does not meet the criteria. An EASA permit is recognised throughout all EASA Member States. The UK has been active in gaining agreements with neighbouring countries (i.e. France, Republic of Ireland) for the acceptance of aircraft operating on a National Permit to Fly. There are also long standing agreements with all ECAC states to allow amateur constructed aircraft to visit these states. Generic Concession number 6 in CAP747 provides more detailed information in this regard.	EASA and CAA are considering Restricted TC's for their fleets as an element of future rulemaking and transition plans. Some EASA transitions are planned by 2015 and CAA will review its requirements in 2014 in this regard.
Maintenance - Suggestions	119	There should be a centralised audit report for Part 145 and Part M to avoid high numbers of audits (sometimes 30 a year).	Serious consideration is being given for the future audits of significant organisations to be consolidated under an entity oversight system. This may involve a team approach of cross disciplinary regulatory auditors carrying out detailed visits over consecutive days. These "bursts" of oversight activity, when introduced, would maintain the quality of oversight with a reduced frequency of separate visits. The long term planning of such activities and the availability of key personnel would need to be considered by the host company when accommodating such activities.	As explained in comment response, timescale still TBD dependant on outcome of review.
Training - Problems	120	Some cite cases where the CAA has approved a manual for one school but then required changes when another school tried to use the same manual (links to differing interpretations of inspectors, see above).	The CAA has recognised this, particularly during the initial implementation phase of Part FCL, and is working to enhance the standardisation of its Inspectors through increased training programmes.	Inspector standardisation training has been improved to address this concern.
Training - Problems	121	ATO charges are excessive and the changes create a lot of upheaval with no clear safety benefit.	The CAA's charges are set to recover the costs of its regulation. The CAA approach to minimise costs include the encouragement of industry to take on more of the regulatory tasks (e.g. through QEs), and to ensure that staff of appropriate experience and skill sets are used for each task.	The CAA has developed a streamlined approach that will help the current registered training facilities to convert to approved training organisation status by April 2015. This process will minimise both the cost and the regulatory burden.
Training - Problems	122	Gold-plating: there is an EASA requirement that ATOs integrate Safety Management Systems into the organisation. The CAA interpretation of this requiring a manual is excessive. They are an excessive requirement.	The CAA is committed to taking a proportionate approach in this area and recognises that, whilst guidance on SMS for small, non-complex organisations has been published on the CAA website, work needs to be done to support industry in adopting practicable SMS relevant to each ATO. Road-shows planned for the Autumn will be one way of increasing our dialogue with industry on this issue.	The CAA is working on material to assist the industry in this respect
Training - Problems	123	Examiners are meant to check English proficiency but the level isn't on licences so no way for them to confirm.	All licences issued since September 2012 will show language proficiency level.	All licences issued since September 2012 will show language proficiency level.
Training - Problems	124	Changes to glider grading system are unnecessary and reduce safety.	It would be helpful to know more about this to help ensure we respond to the root cause of the comment.	More information is required to understand the issue being raised.
Training - Problems	125	CAA has expensive approvals procedures for flight simulators, despite them being in wide use all over the world so rationale for approvals is unclear.	See comment on 142.	See comment on 142
Training - Problems	126	The shift from 7 to 9 PPL exams merely wastes time and money rewriting things.	It is necessary to invest time and effort to ensure questions and exam papers are kept up to date. The current 7 exams, and the questions themselves, were long overdue for revision. The new Theoretical Knowledge syllabus devised by European Regulations has been divided into 9 subjects, so it is rational to have 9 Papers. Most European States have chosen to have 9 Papers.	This will be reviewed in the future; for now the priority is to have a set of exams that adequately test the candidates' knowledge and understanding. The CAA has launched an initiative, with industry, to refresh the PPL syllabi (aeroplanes and helicopters) with a view to having this agreed and accepted by EASA in 2014.
Training - Problems	127	EASA regulations have increased examiners' paperwork and stopped them signing off on SEP revalidations.	The regulations do not affect the privilege to sign SEP revalidations for examiners who conduct skill tests and proficiency checks. However, the UK national "Revalidation Examiner" cannot revalidate a rating on a JAR-Part-FCL licence. The "R" examiner is not included in Part-FCL and unfortunately the CAA was not able to gain support to do so from other countries, as they seem to manage without it.	The CAA (in co-operation with the DfT) will pursue an application for a derogation from EU regulations to implement an equivalence to the R examiner
Training - Problems	128	Should not use screens for instrument rating tests.	The CAA does not now make the use of screens mandatory for IR tests. The choice of how to obscure the external view for IR training/testing will be for the schools to propose and justify according to local conditions and equipment.	The CAA has issued an Information Notice that introduces a new policy. This policy allows the Head of Training to determine the best means to obscure a student pilot's view when under training or test for instrument flying.
Training - Problems	129	CAA charges for IR skills test are excessive. Other EASA states have cheaper arrangements.	The funding of national authorities is different in the various States. In the UK the charging system is designed to be appropriate to task, whilst meeting the government's criterion of meeting the costs of regulation, plus a small defined profit.	The fact that the CAA must recover its costs from industry is a matter of Government policy.
Training - Problems	130	CAA requires an RTF applying to become an ATO to sign a declaration agreeing to pay up to £10,000 per year invoiced in arrears for additional unspecified CAA services.	This issue has been drawn to the attention of the CAA by the LAA and is currently under review.	The CAA has developed a streamlined approach that will help the current registered training facilities to convert to approved training organisation status by April 2015. This process will minimise both the cost and the regulatory burden. A series of roadshows is being undertaken in November to explain the process and new European regulation to industry.
Training - Problems	131	No need to mandate limited panel flight training with turn coordinator and compass.	This is related to the mandatory minimum blind flying equipment fit for aircraft. If the legislation continues to specify a minimum of a turn co-ordinator and altimeter for flight under IFR, pilots must be trained to fly on those instruments alone.	We disagree. The legislation specifies a minimum of a turn co-ordinator and altimeter for flight under IFR therefore the CAA believes that pilots must be trained to fly on those instruments alone.
Training - Problems	132	There is a requirement for coordination between NAAs overseeing organisations operating between member states. CAA interprets this to mean no training flight can go to other member states without a formal agreement.	This is correct and is a safety issue. It is set out in Part-ARA. The reason is to guard against a Training Organisation setting up and gaining approval in one country but then conducting all of its training in another country without the approving authority being able to exercise oversight. Under the previous rules training across national borders was simply prohibited.	The CAA believes that this measure is necessary because otherwise it would be possible for a training organisation to gain approval in one country but conduct all of its training in another country. Thus the approving authority would be denied the ability to exercise oversight.

Training - Problems	133	A regulation says that an ATO must have access to suitable aircraft. CAA takes this to mean own or lease, so cannot learn to fly in own plane. Cannot learn in a group-owned PTF.	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 circumstance where payment may be made to use the aircraft.	No action is required in respect of pilot training / licensing. The use of permit to fly aircraft for training purposes will be addressed by the CAA as part of the recreational aviation programme.
Training - Problems	134	EASA CPL IR is a step down from UK ATPL.	This relates to the fact that to convert a national commercial licence to an EASA ATPL the pilot must have experience in flying multi-pilot aeroplanes. The privilege of the EASA ATPL is to act as Pilot in Command of a multi-pilot aeroplane. Over a decade ago there was a period when the CAA issued ATPLs to pilots who only flew single pilot aeroplanes. Some of these pilots did not move on to multi pilot aeroplanes and so have no multi-pilot experience. On conversion these pilots will be granted CPLs, but this will make no difference to their privileges; they have never been able to fly multi-pilot aeroplanes.	We believe this comment relates to the period some time ago when the CAA issued commercial pilot licences to pilots who only flew single pilot aeroplanes. The conversion to EASA licenses will make no difference because the privileges will still prohibit the licence holder from flying multi-pilot aeroplanes.
Training - Problems	135	Why are slide rules still on the PPL syllabus?	This will be reviewed by the CAA.	The CAA has launched an initiative, with industry, to refresh the PPL syllabi (aeroplanes and helicopters) with a view to having this agreed and accepted by EASA in 2014.
Training - Problems	136	CAA requires registrations of planes being used at RFs. This limits flexibility as CAA takes ages to turn things around.	This will not be required when the RFs become Approved Training Organisations under European rules. As approved organisations, ATOs will have procedures 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 deleted for RFs.	This requirement does not exist for ATOs and all RFs will need to become ATOs by April 2015. In the meantime, the CAA will review the position with the objective of removing this requirement for RFs before they convert to ATO status.
Training - Problems	137	A fixed-wing instructor can't examine an autogyro student in exams, even though the papers are exactly the same.	Some of the Papers for gyroplanes are the same as for other aircraft, but some are specific to gyroplanes and so must be conducted by a gyroplane examiner. To allow the general Papers to be conducted by any Examiner (not instructor) would mean involving 2 examiners. It is less complex to require all examinations to be with a gyroplane examiner.	Not all of the papers are exactly the same - some are specific to Gyroplanes and it is necessary for a gyroplane examiner to conduct the gyroplane-specific exams. It is less complex to require all examinations to be with a gyroplane examiner than two different examiners.
Training - Problems	138	Apparently no way to renew ATPL(A) IR with instructor rating.	This is not correct. If this is not a misunderstanding there may be particular issues with the commenter's individual case.	The CAA would welcome more information on this issue to understand the particular issue.
Training - Problems	139	Exam entry costs far too much.	See item 4 above.	The CAA publishes its 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.
Training - Problems	140	There is no quality control on the exam questions – sometimes they are impossible or illegible.	This has been recognised and the CAA has increased the quality control undertaken on papers. The CAA is also moving to introduce e-exams.	The CAA has already taken steps to improve the quality control of exam papers and is now moving towards the introduction of an e-exam service.
Training - Problems	141	People with dyslexia etc are not given extra time in exams.	The time allowed per question is set out in EU legislation. To allow greater time would require exemption or derogation which would have to include justification of compensating measures to assure no reduction in standards. No compensating measures have been identified.	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.
Training - Problems	142	Flight Navigation Procedure Trainers are made unnecessarily expensive with CAA paperwork and fees. They are regulated similar to full-flight simulators.	FNPT's are subject to EASA regulations. EASA hold the view they require good oversight to assure the fidelity of Flight Crew training. The UK CAA charges: <input type="checkbox"/> £17,240 for an initial FFS qualification <input type="checkbox"/> £4,011 to £9,865 (inc MCPL course) for an initial FNPT qualification <input type="checkbox"/> £4,310 for a recurrent FFS evaluation <input type="checkbox"/> £913 to £2,415 for a recurrent FNPT evaluation.	The CAA would welcome dialogue with FNPT operators to see whether a safety case can be made for a more proportionate regulatory oversight regime for FNPTs which could then be discussed with EASA.
Training - Problems	143	Training is hour-based not performance-based.	The EU rules are derived directly from the JAR-FCL rules that were agreed and implemented by the JAA States circa 2000. There are aspirations to amend the licensing rules to be more performance based, but these must go through the rulemaking process, including public consultation.	The CAA agrees. The CAA will continue to seek to influence the EASA rulemaking programme to develop competency-based rules.
Training - Problems	144	CAA has determined that examiner courses need to be longer than that required by EU law – gold plating.	The CAA will investigate this as part of its commitment to eliminate gold-plating. The CAA believes that the relevant Standards Document may specify course durations that are in excess of the AMC to FCL.1015 published by EASA	The relevant texts will be reviewed and amended as necessary to assure alignment with European requirements.
Training - Suggestions	145	The CAA should write a standard training manual for schools to use if they want rather than approving each individual one.	This suggestion is already being implemented by the CAA.	The manual is being circulated to some stakeholders for comment before publication to allow industry the opportunity to contribute to the template manual.
Training - Suggestions	146	CAA-approved test pilots should not have to inform the CAA of every test flight.	Under proposed amendments to the Airworthiness requirements in the BCAR Section A (CAP 553), planned for introduction in 2013, it will no longer be an requirement to advise CAA of every test flight performed. However, for pilots that are briefed to conduct check flights on behalf of the CAA, it will be necessary for these pilots to inform us periodically of check flights they perform to enable continuation of their authorisation.	The CAA agrees and has already committed to amend the requirement to address this comment.
Training - Suggestions	147	Post test flight documents do not need to be sent by the examiner, as it would be easier to let the pupil do this with the examiner's sign off. The examiner need only carry out the test flight.	The concern here would be increased opportunity for falsification of records by the candidate. The CAA believes it is essential to receive the test result independently.	We disagree. The CAA believes it is essential to receive the test result independently.
Training - Suggestions	148	Examiners should be able to issue temporary airman certificates after successful test flights.	See comment on 56.	See comment 56
Training - Suggestions	149	CRIs should be allowed to charge without having a commercial rating.	The new European Regulations permit this already.	The comment is already addressed under EU legislation
Training - Suggestions	150	There should be some kind of restricted FI rating that is accessible and allows experienced pilots to teach the very basics. No need for CPL.	EASA rules allow pilots with PPL and FI rating to instruct for LAPL and PPL and be paid to do so.	The comment is already addressed under EU legislation
Training - Suggestions	151	Relax rules around RTF moving to FTO/ATO e.g. no need for dedicated classrooms.	The rules for ATOs are specified in Part-FCL.	The CAA agrees and acceptable and proportionate standards are being developed in consultation with stakeholders. It is recognised that for "non-complex" organisations providing PPL and LAPL training appropriate standards need to be agreed and implemented.
Training - Suggestions	152	FTOs should be able to issue licences and ratings in the same way as AMEs issue medical certificates. No need for further CAA role when it already audits the FTO.	The legislation stipulates that only "Competent Authorities" - the CAA in the UK may issue licences and ratings.	European law requires the "Competent Authority" to issue the licences. Nevertheless, the CAA is open to discussion with industry to explore ways in which to lessen the regulatory burden. ATOs can, for example, make the recommendation for the issue of a licence and the CAA then has only to print and issue the document, without reviewing any supporting documentation. We would like to see more ATOs working in this way.

Training - Suggestions	153	Allow LAA aircraft to be used for training, subject to appropriate mechanical check.	This is permitted under the licensing rules.	The current restrictions on payment for use of the aircraft will be reviewed as part of the recreational aviation programme.
Training - Suggestions	154	Some suggested the government make loans to help with CPL training.	This is a matter for the DfT to respond to.	Not a CAA issue
Training - Suggestions	155	Hours spent training for IMC should count towards IR.	Under the rules proposed by EASA in Opinion 02/2003 it is possible that hours spent training for the IMC may be credited against the training for an IR, although this is not yet certain.	The new EU rules are currently being finalised and the CAA expects these to be debated at the EASA Committee in October.
Training - Suggestions	156	Allow training at all non-licensed fields.	This has been permitted since the Air Navigation Order was changed in April 2010	The CAA agrees and the UK legislation has already been amended to allow training at unlicensed aerodromes.
Training - Suggestions	157	No VAT on flight training.	This is a matter for the DfT to respond to.	Not a CAA issue
Training - Suggestions	158	There is confusion around validity of LAPL for microlights and a CAA statement would help here.	All EASA aeroplane licences are valid for microlights if the pilot has completed differences training. The CAA will work with the BMAA to help ensure that appropriate guidance is easily available.	Further guidance is to be produced in conjunction with the BMAA.
Training - Suggestions	159	Remove the requirement for classroom training.	The regulations specify the training that must be provided. Under EU rules this must be part of an approved course. It is for the school to propose and justify the methods by which they will provide that teaching when they apply for the approval.	The requirement may have been misunderstood. The CAA will consider whether guidance on this issue may be helpful.
Training - Suggestions	160	Examiners should be allowed to test their own pupils – trust their integrity.	It was proposed by EASA in the original text of the EU regulations that examiners should be allowed to give up to 25% (but not the last 25%) of the student's training. However, this was rejected by the representatives of the Member State governments at the EASA Committee stage.	This is expressly prohibited by EU law and was a conscious and deliberate decision of the EASA Committee.
Government Departments / Businesses / Other - Problems	161	Planes parked in hangar are deemed to be 'handled' by hangar owner, meaning UKBF makes unreasonable requests and demands from owner.	This is outside the jurisdiction of the CAA.	
Government Departments / Businesses / Other - Problems	162	Airports demand inappropriate insurance for unspecified reasons. The risk is non-existent (e.g. insurance for an incident with a large jet, but no large jets at the airport).	This is not a matter for the CAA.	This is outside the jurisdiction of the CAA.
Government Departments / Businesses / Other - Problems	163	Big airports are unfriendly to GA.	The CAA recognises this as an issue for GA.	The CAA would be prepared to work with all stakeholders to facilitate discussion to see what progress could be made to address this issue.
Government Departments / Businesses / Other - Problems	164	OfCom are introducing new higher charges for ground stations on operating frequencies. This will discourage radio use and reduce safety.	This is not a matter for the CAA.	This is outside the jurisdiction of the CAA. The CAA has worked with OfCom in identifying the impacts on aviation and highlighted specifically concerns about the potential for reduced radio use.
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.	This is outside the jurisdiction of the CAA.
Government Departments / Businesses / Other - Suggestions	166	Remove the requirement for GAR forms or at least greatly simplify them.	This is not a matter for the CAA.	This is outside the jurisdiction of the CAA.
Government Departments / Businesses / Other - Suggestions	167	Greater consideration should be made of the effect wind farms have on safety.	The CAA recognises this as an issue for GA.	The responsibility for assessing the impact of wind farms on aviation safety rests with planning authorities, with appropriate support from aerodrome safeguarding units and the CAA. The CAA is working closely with planning authorities and, in addition to existing general guidance, will publish specific guidance to planners.
Government Departments / Businesses / Other - Suggestions	168	No VAT on flight training or aviation fuel (when training).	This is not a matter for the CAA.	This is outside the jurisdiction of the CAA.
Government Departments / Businesses / Other - Suggestions	169	Oppose proposals for Border Force to charge for its services. Staff have bad attitude to business aviation and advanced notice requirements are excessive. A better arrangement with UKBF is needed.	This is not a matter for the CAA.	This is outside the jurisdiction of the CAA.
Innovation - Problems	170	CAA does not allow ethanol in mogas in Group A airplanes, even though it would allow 5% in same engine if it were in a microlight (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 result in engine stoppage. Engine failure on a microlight is not expected to have as serious a consequence as on larger aircraft due to the lower kinetic energy. The CAA has a process for approval of engine/airframe 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 this fuel. When considering the qualification of an aircraft to use fuels 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 UL 91. CAA publication CAP 747 Generic Concession 7 contains information on the use of UL 91.	No further action is proposed. The comment appears to have been based upon a misunderstanding as explained in comment response.
Innovation - Problems	171	CAA won't allow addition of things like silencers without expensive approvals.	Firstly, if a silencer installation has been previously approved by EASA or a member state prior to 28 September 2003, then this would be eligible for installation on a UK registered aircraft without further showing. For newly designed installations, the fitment of a silencer is considered to be a design change where there is a need to show that engine and aircraft performance is still acceptable. With appropriate substantiating documentation from a design organisation the CAA direct certification costs need not be excessive.	No further action is proposed. The comment appears to have been based upon a misunderstanding as explained in comment response.

Innovation - Problems	172	Innovation is hampered by paperwork and charges for oversight.	This is currently under review as an element of the CAA-wide Performance and Process Improvement (PPI) initiative. The initiative aims to deliver a reduced administrative burden both internally and for stakeholders which in turn will assist in determining over time a more refined charging scheme for our activities. In addition to this general initiative, as part of the recreational aviation review strategy, we have several projects currently underway in Airworthiness targeting areas that support innovation. Such activities include an experimental category of operation, reduced and simplified processes for modifications, changes and repairs including activities to substitute obsolete or out of production materials and a simplification of ways of allowing flights to be performed without a valid Certificate of Airworthiness or Permit to Fly.	As explained in comment response.
Innovation - Suggestions	173	Remove red tape on products/avionics to foster innovation. Certification should be easier.	As mentioned above, the CAA's Airworthiness Team is currently reviewing the processes by which products, such as avionics, are approved for installation on aircraft subject to National Regulation (Annex II). The aim of the review is to streamline the processes with the objective of easing certification.	As explained in comment response.
Innovation - Suggestions	174	Products approved in, for example, the United States should be approved in UK quickly.	The new EU-US Bilateral agreement is intended to make it easier for products initially approved in the USA to be validated within the EU. The same would be true for a product destined for an Annex II aircraft subject to UK requirements only as this would be covered under our UK-US Bilateral agreement. A project has been identified as part of our current programme of General Aviation work to see if we can reduce the burden of our validation processes to a minimum or indeed dispense with the process altogether.	A collaborative review of the national modification process is planned in 2013, with results to be published in 2014.
Innovation - Suggestions	175	Allow FRTOL holders to use all VHF equipment except that specifically prohibited.	Where the FRTOL is issued to a pilot and the radio is in an aircraft, this is already allowed. Is this a question about ground personnel with radio licences?	The CAA would welcome more information on this issue to understand the particular issue.
Innovation - Suggestions	176	Reduce restrictions on modifying certified aircraft. Some suggest the FAA model.	See item 177	
Innovation - Suggestions	177	CAA should simplify processes by simply stipulating specifications and have the manufacturer confirm that it meets them.	EASA has recently introduced the concept of standard modifications/changes (and repairs), which when fully implemented should enable many straightforward modifications to be accomplished without the involvement of a design organisation or EASA. The CAA also intends to adopt similar arrangements for aircraft subject to national regulation. In many areas of certification, the CAA and EASA do simply stipulate the specifications for manufacturer 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 that our oversight is proportionate and appropriate to the level of risk.	A collaborative review of the national modification process (including levels of involvement) is planned in 2013, with results to be published in 2014.
Innovation - Suggestions	178	Allow the LAA to licence small volume new production aircraft (say with upper weight limit of 1000kg).	With the introduction of the CAA new BCAR Chapter A8-26 Recreational Aviation Organisational Approval later in 2013, we hope to address provision for this potential activity. Within the proposed oversight rating there is an element which would allow suitably approved organisations (maybe such as LAA and BMAA) to oversee manufacturers of aircraft that fall within the Annex II category and are relative to the A8-26 organisation's scope. This would significantly reduce the oversight burden for this sector of aviation if indeed, any potential A8-26 organisation were to apply for this element within their overall scope of work.	As explained in the comment response.
Innovation - Suggestions	179	Allow permit aircraft to fly instrument conditions if equipped.	The CAA is assessing an application to allow Permit to Fly aircraft that are suitably equipped and approved, to fly in Instrument Meteorological Conditions (IMC). A Certification 'Special Condition' has been drafted and has been shared with the applicant for their consideration.	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	180	Government/CAA could launch competition to design new solutions for GA avionics.	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.	As explained in comment response.
Innovation - Suggestions	181	Create an experimental class like the FAA has.	One of the aspects of the CAA's recent review of recreational Aviation was to suggest the exploration of an experimental category of airworthiness and operation. Additionally, the Royal Aeronautical Society (RAeS) has been in discussions with the CAA. However, it is anticipated that the collaborative working group will convene in late 2013, with a view to completing this work during 2014.	As explained in comment response.
Innovation - Suggestions	182	Encourage innovation like Sky Demon.	See item 180 above.	
Innovation - Suggestions	183	Increase use of online methods for booking out etc. This would also help CAA gather more data.	The CAA is already introducing more on-line interaction with stakeholders as part of its PPI programme (see earlier comments above).	The CAA agrees and is already moving towards on-line interaction with stakeholders (e.g. on-line application forms, the first of which were introduced this year).
Innovation - Suggestions	184	Increase the weight limits for SDR regime and do not include batteries in the weight limit to promote electric aircraft.	It is planned to amend Article 16(2)(g) of the Air Navigation Order (ANO) to allow a further weight increase for Single Seat Deregulated (SSDR), microlight aeroplanes to allow provision for the installation of a Ballistic Recovery System (BRS) and to allow batteries employed as electric fuel cells to be added in addition to the basic weight.	The CAA's proposals for this further deregulation were published for public consultation in September 2013. See http://www.caa.co.uk/application.aspx?catid=14&pagetype=65&appid=7&newstype=n&mode=detail&nid=2276
Innovation - Suggestions	185	Deregulate all single-seat microlights (say up to 300kg MTWA).	The CAA is continually reviewing developments with the single-seat microlight category of aeroplane and makes the determination of weight relative to the deregulation based on proportionate safety risk. This determination is made after consultation with the current representative bodies.	The CAA's proposals for further deregulation of Microlights were published for public consultation in September 2013. See http://www.caa.co.uk/application.aspx?catid=14&pagetype=65&appid=7&newstype=n&mode=detail&nid=2276
Innovation - Suggestions	186	Ease regulations to encourage manufacturers.	With regard to National requirements, the CAA is planning to review the complete suite of Design and Production Organisation approval requirements with the view to providing a more proportionate framework relative to the respective sectors of the market. Work is already ongoing collaboratively with the BMAA to review the manufacturing requirements for microlights and it is expected that we will also begin work in other respective market sectors to review the requirements as they are currently written. In terms of EASA requirements, charges have already been made to ease the process of parts certification for General Aviation aircraft and further work is ongoing to provide greater proportionality in this area.	As explained in comment response.

Innovation - Suggestions	187	Adopt Irish system where an aircraft licensed in two other countries is automatically licensed there.	Ireland is now bound by EU Regulations. Therefore any aircraft recognised by EASA will be recognised throughout the EU, including Ireland and the UK.	No further action.
Pilots - Problems	188	Thanks to EASA, people are being forced to pay to continue flying planes they could previously fly on a lifetime licence.	See comment on 12	See item 12
Pilots - Problems	189	Licence renewals are pointless when check flights and medicals would flag any issues.	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.
Pilots - Problems	190	Having medicals at AMEs increases costs for no clear benefit. They are too complex and AMEs do not have the same medical history as GPs. NPPL medicals should be used as a model except where there is a clear need for higher medical standards.	The concept of a GP based medical is at the heart of the LAPL medical assessment system and the UK CAA has issued an Alternative Means of Compliance with clear instructions for GPs and AMEs stating which doctors may undertake which assessments. Essentially GPs may undertake assessments when an applicant has no major medical history and AMEs should undertake assessments when aviation medical knowledge is required to make the assessment of fitness. This is a proportionate, risk-based approach. Of note, the CAA is not responsible for setting fees for the medical assessments and the fees charged by AMEs and GPs may vary.	We have already negotiated greater flexibility than that obtained by any other Member State.
Pilots - Problems	191	AMEs are vetted by CAA but not given full responsibility – example of ECG having to be sent to CAA to be analysed.	Only Class 1 ECGs have to be sent to the CAA and only 25% of these are further analysed by a cardiologist. Only cardiologists have the professional medical training required to read ECGs. 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.
Pilots - Problems	192	There seems to be no way for military pilots to transfer their experience quickly and easily to the civilian system.	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	Arrangements are already in place and have been published in CAP 804 on the CAA website.
Pilots - Problems	193	A recent sea-plane rating change requires 12hrs of flight. This is difficult to reach in sea-planes and should include normal planes as the mechanics are the same once in the air.	This is being addressed through international meetings with EASA and the other Member States	The CAA agrees and is currently working to influence the outcome of European discussions.
Pilots - Problems	194	The issue date on national licence renewals is based on the previous expiry date, which may be in the future and makes the licence look suspect.	This is recognised and is a quirk of our old IT system. It would be unduly expensive to correct.	The CAA recognises this and the matter will be fixed as part of the new Licensing IT system.
Pilots - Problems	195	LAPL requirements are overly bureaucratic and onerous on GPs.	The LAPL requirements have been designed to be the least bureaucratic and as simple as possible for GPs given the overarching EASA LAPL medical requirements which have been put in place.	We have already negotiated greater flexibility than that obtained by any other Member State.
Pilots - Problems	196	Lifetime FRTOL becomes invalid thanks to EASA.	No it does not. The FRTOL remains and is lifetime, but pilots must have valid language proficiency (level 6 - fluent - is non-expiring).	The commenter appears to have misunderstood the rule.
Pilots - Problems	197	90 day rule can make it illegal for aircraft groups to impose recency requirements and often creates perverse incentives.	Aircraft groups can require recency assurance, but the 90 day rule relates to carrying passengers. Groups cannot appoint “check pilots” to carry out recency checks with a pilot who is not 90 day current, only an instructor can fly with such a pilot.	We believe this to be a misunderstanding. More information would be welcome.
Pilots - Problems	198	Introduction of ratings for gliders is unnecessary.	See comments on 22	See item 22
Pilots - Problems	199	Class 2 medical is excessive for SEP.	The EASA Class 2 medical is now broadly in line with ICAO Class 2 medical requirements and much less of a regulatory burden than the previous JAR Class 2 (this was a UK CAA achievement in European negotiations). SEP aeroplanes can be flown with the new LAPL(A) licence, for which a LAPL medical – even less onerous than EASA Class 2 - is required	EU regulations already permit Single Engine Piston (SEP) aeroplanes to be flown throughout Europe with a LAPL Medical, which is less demanding than a Class 2.
Pilots - Problems	200	Previously renewing SEP rating required one hour flight and one form. Now requires 8 forms.	Forms are being addressed as a matter of urgency	The CAA recognises the issues here and is working to ensure the relevant forms are revised and simplified.
Pilots - Problems	201	The PTF/CofA boundary is purely regulatory and not based on how much skill the plane requires. People are arbitrarily prevented from flying planes based on the classification.	The licence privileges have no dependency upon whether an aircraft has a permit to fly or CofA. There is a dependency upon whether the aircraft is an “EASA aircraft” or within the categories of “Annex II” to Regulation 216/2008. This division is based solely upon the airworthiness provenance of the aircraft. The original intent of the Commission was that all aircraft registered, designed or manufactured in Europe would come within the EU regulations. This proved to be impractical for aircraft that are not supported to ICAO-Annex 8 standards. i.e. For Microlight, homebuilt and some vintage aircraft, there were no common standards that EASA could adopt across Europe. Consequently, the decision was taken to leave these aircraft under national rules - at least initially. Thus, the distinction between Annex II and EASA aircraft was made of necessity based upon airworthiness considerations. Because this distinction is made in the top level legislation, it also applies to the subordinate licensing rules. The UK Air Navigation Order has been amended to that Part-FCL licences that are valid for EASA aeroplanes are also valid for Annex II aeroplanes that are within class ratings - thereby reducing significantly the need for pilots to hold both EU and UK licences.	UK Legislation to allow European licences to be used for nationally regulated aeroplanes is already in place.
Pilots - Problems	202	Licensing documentation is far too complicated. CAP804 is almost unusable and should at least have an index.	The need to simplify our advice and guidance is recognised. CAP804 is intended to be a single source document for licensing. It is accepted that it is not easy to find information. However, an index of the Paper document is not a preferred solution. The document is available free to download from the CAA website. The PDF is bookmarked and so has a contents/index list that acts as hyperlinks, there is also a drop-down contents feature, and a search by word function. We are looking at developing the electronic publication further to compile related information into a temporary file according to the interests of the reader. We are also considering publishing “quick guides” for each kind of licence.	This will be addressed as part of the general initiative to provide better, more accessible and readable publications.

Pilots - Problems	203	Current licensing system requires some rotary pilots to have both EASA and national licence.	This is unfortunately unavoidable as helicopters have type ratings and Annex II type ratings cannot be added to a Part-FCL licence. However, any pilot who holds a Part-FCL licence and qualifies for an annex II rating will be provided with an equivalent national licence including that rating. The Part-MED medical certificate will be valid for both licences	This is a by-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.
Pilots - Problems	204	Medical requirements for gliders are excessive.	The LAPL medical is common for all LAPL licences. The holder of a LAPL medical can use it to support a LAPL(A), LAPL(S), LAPL(H) and LAPL(B). It can also be used for any UK NPPL	The CAA has already negotiated greater flexibility than that obtained by any other Member State
Pilots - Problems	205	It is inconsistent that Annex II helicopters require a Class I/II medical, not a declaration.	Under the new EASA rules there is a LAPL(H) with a medical standard that is below than Class II. The holder of a LAPL(H) may apply to the CAA for an NPPL(H) that can contain Annex II helicopter ratings. For the NPPL(H) the pilot must hold a LAPL medical (or Class 1 or 2) - but a medical declaration is not acceptable.	The commenter is not correct. Helicopters can now be flown on a medical that is below class 2 standard
Pilots - Problems	206	Since the microlight/SEP boundary is blurred, mainstream microlights for regulatory purposes.	The BMAA is against this. The matter is under review following publication of safety recommendations arising from a fatal accident.	This will depend upon the public consultation on proposals for rule changes to address the accident report recommendations concerning differences training.
Pilots - Problems	207	Pilots need to carry far too many documents.	The requirements in this respect have not been changed. It would be helpful to have more detail from the commenter to better understand the cause of the concern. The comment may refer to the requirement to carry copies of documents such as the Certificate of Airworthiness, Certificate of Registration etc. which will come in to force with the introduction of European regulations for Air Operations. These requirements were added in order to comply with ICAO Standards for international flights. The CAA supports a reduction in the requirement for domestic flights	We would welcome more specific information about this comment.
Pilots - Problems	208	Commercial pilots are having to do a skills check flight in something like a PA28 to have a valid type on their British ATPL to allow them to transfer to EASA ATPL to retain the licence.	A valid aircraft rating is required for the first issue of an EASA licence. It can be any aircraft type or class - it does not have to be an SEP. The new licence would be unusable without a valid aircraft rating.	The EU regulations already allow what is requested by the commenter.
Pilots - Problems	209	New paper requirements for Permit to Fly aircraft visiting UK make it too complicated and discourage people.	The CAA would welcome more information on this to better understand the concern.	More information would be welcome.
Pilots - Suggestions	210	Simplify licensing system: just have private and commercial.	This would require a complete re-write of the EU aircrew regulation and will not be supported in Europe for the foreseeable future. It would also add further regulatory changes and upheaval which other commentators have not welcomed. There is also a need to ensure that compliance is maintained with ICAO Standards.	No further action on this at the current time.
Pilots - Suggestions	211	Relax the restrictions on colour blind pilots. Australia allows colour-blind people to fly with no safety detriment. PAPI lights are rarely used.	The licensing restrictions have been reduced. The new Opinion 03/2013 on instrument flying allows pilots to gain an IR without flying at night. The CAA has introduced a Colour Assessment and Diagnosis (CAD) Test which has considerably relaxed the restrictions for pilots with mild colour deficiencies.	This has already been addressed
Pilots - Suggestions	212	Make it easier to get IR without having to do ATPL. High Performance Aircraft rating should not require ATPL.	The EASA Opinion 03/2003 addresses new means to gain an IR. ATPL exams are not required now to gain an IR. There is no requirement to hold an ATPL to obtain any aircraft rating.	EASA rulemaking has already addressed this
Pilots - Suggestions	213	Retain the IMC.	The CAA has successfully negotiated that any pilot who qualifies for the IMCR before 8th April 2013 will be able to retain the privileges on a Part-FCL aeroplane licence indefinitely as an IR(R). Discussions continue on the ability to add the IMC privilege to a European licence after that date.	The UK CAA will continue to negotiate for this.
Pilots - Suggestions	214	Include all endorsements on one LAPL with one medical to reduce cost and documentation.	Pilots are only permitted to hold one Part-MED medical certificate to support all of their Part-FCL licences. The Part-FCL rules follow the same principle as the previous JAR-FCL and national legislation by specifying that the pilot will have a separate licence for each aircraft category.	The EU regulations already allow what is requested
Pilots - Suggestions	215	Reduce paperwork around medicals and allow GPs to do them. Use NPPL approach.	The LAPL medical assessment may be undertaken by a GP in some circumstances (see above). The NPPL approach could not be adopted across Europe as it relies on an individual being registered with an NHS GP. The GP system in the UK does not exist elsewhere in Europe.	The CAA has already negotiated greater flexibility than that obtained by any other Member State
Pilots - Suggestions	216	Make PPL medicals more proportionate.	The PPL medical assessments have been made much more proportionate by aligning Class 2 medicals with ICAO and by introducing the LAPL medical assessment.	The regulations already allow the option requested
Pilots - Suggestions	217	Revise medical requirements in line with new technology and capabilities.	Medical guidance material is continuously being changed to reflect new medical technology and practice. In addition the CAA's Medical department is active in suggesting changes to medical requirements to EASA.	This is a continuous activity and the CAA has taken the initiative to lead in many such cases: e.g. colour-blindness as discussed above.
Pilots - Suggestions	218	Allow anyone with FRTOL to operate A/G station without further permits.	CAA agree that there are aspects of the ROCC that may not be necessary for FRTOL holders to complete. Consequently, CAA have been considering adapting the ROCC to introduce a modular approach so that personnel with other RT qualifications could be given alleviation from specific aspects of the examinations.	The CAA will review ROCC requirements to establish if a modular examination can be introduced to enable alleviation of aspects for FRTOL holders
Pilots - Suggestions	219	Allow gliders to fly in IMC without IR.	The EASA FCL.008 Working Group reviewed this fully and decided that a cloud flying rating must be held. This is tailored to gliding needs and is not a full IR	EASA rulemaking has already addressed this
Pilots - Suggestions	220	Holders of NPPL/LAPL should be able to get further ratings. Allow access to IMC/night ratings for 3-axis microlights and home-builts. Access to IFR should be based on aircraft capabilities not regulatory regime.	There are no plans to further develop the NPPL as it is likely to be superseded by the European LAPL. The EU rules, that were fully consulted upon require that the pilot of an aeroplane holds a minimum of a PPL to fly in IMC Microlights are not certificated for flight in IMC	No further action.
Pilots - Suggestions	221	For 90 day rule a distinction should be made for when the passenger is a fellow pilot.	The CAA will investigate whether such a distinction can be made within the scope of European Regulations and will discuss the potential with EASA.	See comment response.
Pilots - Suggestions	222	Review the 12hrs in 2nd year requirement as it is arbitrary and not linked to competence – maybe just have another check flight.	The pilot has a choice of: 1. completing the hours and having a 1 hour flight with an instructor; or 2. passing a test with an examiner	The regulations already allow the option requested
Pilots - Suggestions	223	Allow a 5% non-aerobatic cockpit load increase as BGA did.	More information is required to better understand the cause of concern on this topic.	More information would be welcome.
Pilots - Suggestions	224	CAA should accept logbook evidence more.	We do, if it is certified as accurate by an instructor, examiner, or head of training of a school	This is already permitted

Pilots - Suggestions	225	Should move back to rolling self-validation rather than biennials.	This rolling self-validation procedure is the system for the new EASA LAPL licences	The regulations already allow the option requested
Pilots - Suggestions	226	Allow medical self-certification up to 60/70.	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
Pilots - Suggestions	227	Stop charging for licence renewals. If there are to be renewals, no need for CAA involvement – simply have examiner sign it off.	All new licences are lifetime, non-expiring. The rules already allow examiners to sign licences to renew or revalidate ratings	This is no longer pertinent
Pilots - Suggestions	228	Reduce regulations on cost-sharing, so that some money can change hands provided that passenger is aware of the legal situation.	This subject will be reviewed in the CAA GA Programme	We agree. This subject will be reviewed in the CAA GA Programme
Pilots - Suggestions	229	Remove the Class I medical requirement for pilots over 65 to have a stress ECG.	Pilots over 65 are not allowed to conduct commercial air transport flights. 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)
Pilots - Suggestions	230	Remove the £20 fee to update EASA licences (adding ratings etc.). Increase space so that it needs reissued less.	The space has been increased. The £20 reflects the cost to the CAA of reprinting the licence, and it is government policy that the user pays	Change already made
Pilots - Suggestions	231	Hours flown in microlights should be allowed for PPL-A revalidations.	Whilst the current view is that this should not be permitted, Safety Recommendations from a recent fatal accident report have triggered a new review of this.	This will depend upon the public consultation on proposals for rule changes to address the accident report recommendations regarding differences training.
Pilots - Suggestions	232	Why does a PPL(M) need an examiner to sign off the logbook every year?	There are exemptions in place (as there have been for many years) that allow the PPL(M) to be renewed every 24 months as if it were an NPPL(Microlight). The BMAA is well aware of this and advises its examiners accordingly.	The regulations allow other options
Pilots - Suggestions	233	Medicals for HGV driving, piloting, ATC, marine etc. should all be transferable.	There are different risks to public safety that need to be assessed for different roles. Flying in particular exposes the pilot to a different environment from on the ground and these environmental factors also need to be considered.	No further action.
Pilots - Suggestions	234	Allow SEP revalidations on a 3-axis microlight as differences are minimal.	The BMAA does not agree that the differences are minimal. Safety Recommendations from a recent fatal accident report have triggered a new review of this.	This will depend upon the public consultation on proposals for rule changes to address the accident report recommendations regarding differences training.
Airspace - Problems	235	Decisions on airspace are dominated by commercial considerations.	CAPs 724/725 require that all aviation stakeholder interests are considered and reflected in any airspace change decision. The attending consultation process, whilst usually targeted at specific stakeholders, is open to all and all inputs to it are captured. It is recognised that Commercial Air Transport is a significant stakeholder in the UK's airspace requirements but it is not the only one and DAP are required to take a balanced position to ensure all user requirements are accommodated where possible and the prime consideration of safety is satisfied at all times.	Airspace changes are considered in accordance with extant consultation processes. Where appropriate, CAA can engage with stakeholders to improve understanding of the process. This is currently being offered as part of the Birmingham airport airspace change proposal. In addition, the CAA's new GA Unit will work closely with the Airspace regulators in SARG to ensure that GA interests are taken fully into account in future airspace design.
Airspace - Problems	236	In one case CAA required someone to be in the tower at a licensed airfield for no clear reason.	Insufficient detail to comment upon.	We would welcome more information to enable us to comment in more detail.
Airspace - Problems	237	GA has to fly low beneath Class A even though the jets are at 18,000ft. Most of the block is therefore empty.	Class A airspace is designed to take into account a plethora of airspace users and profiles. DAP is required to ensure that the volume of Controlled Airspace used to protect Instrument Flight Procedures and Air Traffic Service Routes is the minimum practicable volume. The majority of low level Controlled Airspace is there for the protection of Instrument Flight Procedures (including SIDs and STARs) from and to aerodromes. One of the benefits of the Future Airspace Strategy and the introduction of Performance Based Navigation is that as more modern procedures, incorporating Continuous Climb/Descent Operations, come into being it is anticipated that areas of Controlled Airspace may be released to Class G.	We will improve communication to explain how airspace design is derived.
Airspace - Problems	238	Mode S requirements are costly with no benefit to GA.	Not all aircraft operating below FL100 and outside controlled airspace require a transponder. The co-operative nature of the environment above FL100 or inside controlled airspace means that additional systems which enhance overall safety performance are required. Through the Airspace and Safety Initiative, the CAA will seek opportunities to better explain the requirement and benefits.	We will ensure that the needs and benefits of a co-operative environment are communicated as part of the outcome of the Airspace and Safety Initiative Electronic Conspicuity Working Group investigations.
Airspace - Problems	239	Lateral limits of airspace are irregular and too complicated.	DAP is required to ensure that the volume of Controlled Airspace used to protect Instrument Flight Procedures and Air Traffic Service Routes is the minimum practicable volume. Applying this standard has in the past led to irregular shapes and frequently-stepped bases to minimise Controlled Airspace. Simplifying lateral and vertical limits whilst maintaining procedure containment would lead to larger volumes of Controlled Airspace.	See 238
Airspace - Problems	240	Requirement to remain 1000ft from cloud is unenforceable and can only be determined by flying up to cloud and then back down, thereby breaking the requirement	The visibility and distance from cloud minima are consistent with the International standard applied by ICAO. In accordance with that guidance pilots are expected to use their judgement and available meteorological information to make an assessment.	We disagree. The 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	241	Why do England and Wales have a requirement for transponders over 10,000ft? Not in Scotland.	The transponder requirement is the same across the UK albeit that there are some local variations over Scotland to assist the gliding community in their transition to a regulatory requirement to comply with transponder carriage regulations having previously enjoyed an exemption.	Statement is incorrect
Airspace - Problems	242	Class A around London TC goes too low.	Airspace design is based on the operational requirement. DAP is required to ensure that the volume of Controlled Airspace used to protect Instrument Flight Procedures and Air Traffic Service Routes is the minimum practicable volume in which to safely contain them – vertically and laterally. The majority of low level Controlled Airspace is there for the protection of Instrument Flight Procedures (including SIDs and STARs) serving London TMA aerodromes. One of the benefits of the Future Airspace Strategy and the introduction of Performance Based Navigation is that as more modern procedures incorporating Continuous Climb/Descent Operations, come into being it is anticipated that some areas of Controlled Airspace may be released to Class G.	See 238

Airspace - Problems	243	Glasgow Class D was designed to protect a two runway operation but second runway was decommissioned.	The Glasgow CTR was originally predicated on 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	244	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.	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	245	Radio failure procedures under IFR are far too complex.	DAP have recently reviewed the RCF procedures to clarify some issues of the actions to be taken by both Pilots and Air Traffic Controllers. The UK RCF procedures are based on the ICAO RCF standards and our ability to differ from these is limited.	This has been recently reviewed and is in line with international standards.
Airspace - Problems	246	Radio phraseology is too complicated. Revert to internationally agreed standards.	CAP 413 is based upon internationally agreed phraseology.	UK phraseology is in line with international standards
Airspace - Problems	247	UK ATC has successfully absolved itself of all responsibility.	Insufficient information to comment	We would welcome more information to enable us to comment in more detail.
Airspace - Suggestions	248	Where airport usage figures no longer justify their amount of CAS, 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 DAP's decision making process.	See 238
Airspace - Suggestions	249	The regulation on flying within 500ft of the ground when landing or taking off should apply to all airfields, not just government or licensed aerodromes.	Aircraft landing and taking off in accordance with normal aviation practice are exempt from the 500ft Rule regardless of the kind of aerodrome it is operating at.	Statement appears incorrect
Airspace - Suggestions	250	There should be an escape procedure in place over London should something go wrong.	Contingency plans exist for flights within the London TMA controlled airspace and are managed by ATC. Outside controlled airspace, aircraft are required to fly not below a height from which a safe emergency landing can be carried out in the event of an engine failure.	Contingency plans exist for flights within the London TMA controlled airspace and are managed by ATC. Outside controlled airspace, aircraft are required to fly not below a height from which a safe emergency landing can be carried out in the event of an engine failure.
Airspace - Suggestions	251	Airspace should be reviewed to take account of modern technology e.g. climb rates of new jets.	Requirements for Controlled Airspace have to take account of the performance capabilities of all aircraft using the airspace. As newer RNAV procedures come into being it is anticipated that areas of lower Controlled Airspace will be released.	See 238
Airspace - Suggestions	252	CAA/NATS should develop online version of aviation charts as the paper ones are too dense to read accurately, leading to accidental incursions. Link to NOTAMs, etc.	In order to meet its international obligations, UK is required to promulgate NOTAM in accordance with the standards laid down by ICAO. By conforming to the standards, NOTAM can be disseminated to an international audience in one standardised format. From its inception, the NOTAM system was never designed to be fully machine readable, the global system has not kept pace with modern technologies and we are therefore in the situation alluded to. All NOTAM are not fully machine-readable and they cannot all be graphically depicted over an electronic aeronautical chart without some manual intervention. At European Level, the work to define the specification for a digital (fully machine-readable) NOTAM has been under way for several years. This work is at an advanced stage though the complexities associated with the introduction of digital NOTAM need to be managed carefully in order to ensure that industry is prepared and users of legacy systems are not ignored. UK CAA fully supports the digital NOTAM concept and continues to contribute to its development. CAA will work with the UK AIS provider to implement digital NOTAM at the earliest opportunity, though only when the concept has been proved and industry is prepared. There are some non State tools available through internet sources that will graphically display NOTAM over an aeronautical chart.	CAA are engaging at an international level to address this concern.
Airspace - Suggestions	253	Clearer regulation of operating hours of MATZ would help.	The CAA does not regulate the operation of MATZ.	Not a CAA responsibility however the CAA will raise this with the MAA for its attention.
Airspace - Suggestions	254	Make most of the country class E up to FL100 and use D around airports.	This would require all the Class E to be serviced to support the IFR operations therein and currently the infrastructure and resource is not available.	This would require all the Class E to be serviced to support the IFR operations therein and currently the infrastructure and resource is not available.
Airspace - Suggestions	255	Remove CAS(T) (temporary controlled airspace) as it offers no safety benefit and is presumably a security risk by publicising routes.	The CAA considers that, as was seen during the Olympics, CAS(T) can be an appropriate 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.	The CAA considers that, as was seen during the Olympics, CAS(T) can be an appropriate 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 - Suggestions	256	Prohibited 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	We would welcome more information to enable us to comment in more detail.
Airspace - Suggestions	257	Class A transits should be allowed either SVFR or IFR with an IMC 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 11, and in due course Standardised European Rules of the Air. SVFR is only possible in Control Zones.	The ICAO airspace classifications are applied in the UK FIRs in accordance with ICAO Annex 11, and in due course Standardised European Rules of the Air. SVFR is only possible in Control Zones.
Airspace - Suggestions	258	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. DAP encourage dialogue between ANSPs and users to facilitate the best possible design solutions.	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. DAP encourage dialogue between ANSPs and users to facilitate the best possible design solutions.
Airspace - Suggestions	259	Re-examine: the Manchester LLC, the Baldock-Ware corridor, the Bovingdon VOR 'corner', the Class D corridor between Glasgow and Edinburgh, the Solent/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	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	260	A fundamental review of UK airspace is called for.	The CAAs Future Airspace Strategy will review the UKs future aviation requirements	The CAAs Future Airspace Strategy will review the UKs future aviation requirements

Airspace - Suggestions	261	No charging for transits should be implemented and IFR approach fees should either be abolished or else minimised to acceptable levels.	The CAA is aware of an airport that for a short period did promulgate words that suggested such a charge may apply. The CAA raised the issue with the airport and a correction to their wording has been made.	CAA believe this issue has been addressed at the Airport concerned.
Airspace - Suggestions	262	Airspace boundaries should be less arbitrary and easier to understand by e.g. following landmarks.	DAP are required to ensure that the volume of Controlled Airspace used to protect Instrument Flight Procedures and Air Traffic Service Routes is the minimum practicable. Applying this standard has in the past led to irregular shapes and frequently-stepped bases to minimise Controlled Airspace. Simplifying lateral and vertical limits whilst maintaining procedure containment would lead to larger volumes of Controlled Airspace	See 238
Airspace - 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 Airspace and Safety Initiative Electronic Conspicuity Working Group. The aim is to achieve a scaleable 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.	This proposal will be examined by the Airspace and Safety Initiative Electronic Conspicuity Working Group. The aim is to achieve a scaleable 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.
Airspace - Suggestions	264	Remove the need for an actual ADF system in an aircraft for IFR flight.	It is the aim to change the requirement in Schedule 5 of the Air Navigation Order. Currently such changes are restricted due to our deferment to EASA on such issues. However, until the ANO is changed the issue is addressed in AIC: Y 107/2011 dated 22 Dec 2011, which is referred to in ORS4 No. 882: General Exemption from requirement to carry automatic direction finding equipment in specified circumstances. ORS4 No. 882 is available on the CAA website.	It is the aim to change the requirement in Schedule 5 of the Air Navigation Order. Currently such changes are restricted due to our deferment to EASA on such issues. However, until the ANO is changed the issue is addressed in AIC: Y 107/2011 dated 22 Dec 2011, which is referred to in ORS4 No. 882: General Exemption from requirement to carry automatic direction finding equipment in specified circumstances. ORS4 No. 882 is available on the CAA website.
Historic - Problems	265	Cannot receive money for giving 'flying experience' sessions so companies dodge this by offering flight training.	Companies are not prohibited from receiving money for 'flying experience' sessions, however, when doing so they are required to comply with the standards for public transport flights which it is accepted may not be practicable. This is deemed to be appropriate in the case of fare-paying passengers who have no control over the level of risk they are exposed to. Persons undertaking a flying lesson are a member of the flight crew and it is deemed that in making the decision to participate in such an activity the individual has accepted that they are exposed to a higher level of risk than they would be flying with an airline. Therefore the CAA believes that this distinction is appropriate. However, this subject has been considered as part of a wide-ranging review of the regulation of recreational aviation and may be subject to change. Furthermore, EASA is developing proposals to allow flying schools to conduct certain 'promotional flights' and the CAA is contributing to this task.	The CAA will review this subject 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 result in a very similar set of requirements to those we have in Europe. However, in the UK, most if not all historic aircraft fall into Annex II regulation, which means they are not in fact governed by Part 145 but our BCAR equivalent maintenance requirements. These national requirements are currently undergoing revision to introduce provision for aircraft operating on Permits to Fly which again will cover the majority of the UK historic fleet. These requirements have been subject to public consultation and are now being finalised in collaboration with the Historic Aircraft Association (HAA).	As explained in comment response.
Historic - Suggestions	267	Make medical requirements easier to encourage involvement in historic aircraft.	SEP aeroplanes and helicopters up to 2000 kg can be flown with a LAPL licence. The LAPL medical is not as demanding as Class 2 medical requirements.	As explained in the comment response.
Historic - Suggestions	268	Relax rules on operating passenger carrying historic aircraft so that more can experience them.	This 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.	As explained in the comment response.
Historic - Suggestions	269	Insurance requirements should reflect actual operating weight, not original max weight.	This is not under the jurisdiction of the CAA.	See comment response.
Historic - Suggestions	270	CAA should allow flight beyond Design Authority requirement, subject to appropriate checks.	The Air Navigation Order (ANO) within Article 18, makes it clear that the CAA must be 'satisfied' before allowing an aircraft to fly. The normal way CAA becomes satisfied is via the assessment of submissions from an appropriate Design Organisation who have demonstrated their capabilities for approval including the flight testing activity described in BCAR Section A, Chapter A8-9 ('B' Conditions). An alternative way of allowing flight is via a Permit to Test which is granted once CAA are satisfied via individual technical investigation.	Misunderstanding as to what is allowed within the ANO & BCAR's. However, please refer to comment 181 re 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.	All new rulemaking activity is undergoing a process whereby we examine the content 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.	See comment response.
Historic - Suggestions	272	GA could be considered part of heritage.	More information is required to better understand the cause of concern on this topic.	See comment response.
Aerodromes - Problems	273	Charges to approve airfield approach procedures are excessive.	See item 4 above.	The CAA publishes its 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.
Aerodromes - Problems	274	Noise abatement procedures are excessive for the noise created – nimbysism.	The CAA provides guidance to aerodromes as to good practice in managing relationships with neighbouring communities with regards to noise and other issues, however, Aerodromes create their own noise abatement procedures to manage the relationship with their local community. Local forums often manage this.	This appears to be a misunderstanding about the CAA's role in noise abatement procedures.
Aerodromes - Problems	275	It is too difficult to built/alter hangars.	Decisions concerning local land use and planning issues, lie solely within the remit of local authorities. However, licensed aerodromes are required under Condition 3 of their licence to obtain prior approval from the CAA before making any changes to the physical characteristics of the aerodrome (inc erection of new or alteration to existing buildings. The process is explained in CAP 791. The majority of changes fall in the "minor" category and do not attract any additional oversight charges. It is unlikely that a new hangar or alteration to an existing hangar at a GA aerodrome would attract an additional charge	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 - Problems	276	Aerodromes have variable incomes by size but high fixed regulatory costs.	The cost of an aerodrome licence varies depending on the maximum size of aircraft used for public transport or flying training which the applicant expects to use the aerodrome. More complex aerodromes with air navigation service providers are subject to additional charges.	This would depend upon whether the CAA will revise its charging scheme. However, the large industry (such as BAA, BA, NATS) do cross-fund the GA community within our charges.

Aerodromes - Problems	277	Planning regulations for small airports are identical to those for large airports.	Decisions regarding planning regulations and local land use lie 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. CAP168 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 airstrips and helipads is not covered by the restrictions cited above though ANO rules concerned the display of dangerous or confusing lights inter alia may be a limiting factor.	See the CAA comment - we will commit to review the situation and provided we can establish satisfactory assurances against malicious use, we will revise the procedures.
Aerodromes - Suggestions	279	Allow instrument approaches with GPS without ATC, as in US and France.	The CAA recognised 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 (Air Navigation 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.	See CAA comment
Aerodromes - Suggestions	280	Airfields should be greenfield or otherwise protected from development.	Decisions regarding planning regulations and local land use lie 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	281	Airfields should not have opening hours or require prior permission.	The Rules of the Air require that an aircraft shall not move on the manoeuvring area of an aerodrome without the permission of the person in charge of the aerodrome or the air traffic control unit.	This is outside the jurisdiction of the CAA.
Aerodromes - Suggestions	282	The meaning of opening hours should be clarified.	An airport decides which opening hours it will promulgate. Those hours are published in the UK Aeronautical Publication in accordance with ICAO requirements. For a licensed aerodrome the CAA requires that licensing standards are met during the opening hours; this includes the provision of the agreed level of rescue and fire fighting provision. The hours may vary depending on local planning conditions and environmental considerations. Operations outside of the published opening hours are a matter for agreement between the aerodrome and the parties concerned.	There is no automatic right to use an aerodrome and the appropriate permission needs to be obtained from the aerodrome operator.
Aerodromes - Suggestions	283	Reinstate public viewing areas at airports.	This is a decision for the aerodrome concerned taking airport security into consideration.	Misunderstanding about the CAA's role
Aerodromes - Suggestions	284	Stop mandatory handling.	Mandatory handling services are not a requirement of the aerodrome licence. The EU Ground Handling Directive requires airports to make provision for self-handling but General Aviation falls outside of its scope. Therefore this is a purely commercial decision which is at the discretion of the airport. The CAA does, however, share some concerns that GA consumers are	Misunderstanding about the CAA's role
Aerodromes - Suggestions	285	Set up development grants for farm strips.	This is not a matter for the CAA	Misunderstanding about the CAA's role in land use planning.
Aerodromes - Suggestions	286	Airfield licensing to exclude fire service provisions.	Fire service provision is an integral part of the safety standards required for an aerodrome licence. It is now possible to conduct most flying training and some general aviation activities from unlicensed aerodromes. I think we need some words here about the first responder work that we did a number of years ago as a result of the GA review then. Not all small aerodromes need a full fire service.	We disagree. Fire service provision is an integral part of the safety standards required for an aerodrome licence.
Aerodromes - Suggestions	287	Some airfields should be kept for emergency landing purposes.	The meaning of this comment is not clear. I think it might be implied that GA aerodromes are closing and they are then not available for emergency landings during cross country trips etc. These aerodromes would not need a CAA license if they were not accepting commercial flights, so it is not a matter for the CAA.	The UK has a good network of licensed and unlicensed aerodromes available 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 advice is sought by government in some cases of planning dispute.