

## **General Aviation Alliance**

### **Response to the GA ANO Review**

#### **Introduction**

The GA Alliance is a group of associations representing, as far as possible, UK General Aviation (GA) and particularly Sports and Recreational Aviation (SRA) interests. The Alliance coordinates some 72,000 subscription-paying members of these bodies. These members represent the owners/operators of around 60% of the UK registered aircraft fleet, rising to over 70% when unregulated aircraft are included. Activities cover parachuting, hang gliding, gliding, ballooning, plus sport and recreational flying in light and microlight aircraft and in helicopters. The objective of the GA Alliance is to co-operate and engage with government departments and other relevant organisations on regulatory and directly-related matters, to support and progress the activities of SRA. This response has been agreed by the member bodies of the GA Alliance. Individual associations may also submit responses to deal with issues specific to their operation.

#### **General Comments**

We would first point to the GA Alliance response to the CAP 1188 (Regulating General Aviation in the UK: Consultation on the CAA's draft GA policy framework) in July 2014, where we set out six principles that we believed were important in the regulation of GA. The current ANO consultation document follows from CAP 1188 and the subsequent GA Policy Framework, with a wide range of specific proposals. In general, GAA supports the approach taken in the current ANO review, and supports CAA's clear intent to minimize regulation, eliminate gold-plating, and delegate where appropriate. We have two general comments before responding to the detailed questions set.

1. Although we appreciate the need for impact assessment, the focus on 'time saved' in many of the questions is not always helpful. Time saved is not necessarily a proxy for cost saved or financial benefit. Brevity, clarity and simplicity in, for example, flight operations regulation has a direct safety implication through enhanced understanding and hence better, more consistent decision making. These are perhaps the most important aspects for SRA.

2. "Less detail, more guidance". We agree that this is an appropriate approach for modern regulation. It represents current good practice, and aligns with the direction in which both EASA and FAA are moving. Detailed means of compliance to regulations means more than guidance materials, it will also sometimes require rules. The expressed intent in the consultation is that CAA will write these detailed rules, presumably amending them if necessary. We do have concerns that this could gradually become the entry point for a new generation of gold-plating. Moving to current regulatory *best practice*, the industry and capable stakeholders (including the relevant associations) should be brought into the process by engaging them directly in preparing means of compliance, whether rules or guidance.

3. There is also a need for CAA to improve access to SRA data (both operational and safety), either through their own resources or via working with the associations. It is difficult to adopt effective proportional risk-based regulatory strategies without the right evidence.

## Responses to Specific Questions

### Principles for the review

**Question 1:** - Do the current regulations that apply to GA aim for the correct levels of safety? Please answer yes or no. If necessary, please give examples why.

*No. There is an inconsistent approach based on history, which the consultation document recognises should be rationalised and clarified, using a risk-based approach founded on evidence and clear principles. Examples include the limitations attached to a permit to fly, that have included restrictions which are not evidence-based (e.g. overflight, training, night VFR).*

**Question 2:** - Are we correctly deploying our regulatory tools? Please answer yes or no. If necessary, please give examples why.

*No. Again there is inconsistency, perhaps inevitable where the regulations themselves have the deficiencies referred to above. Sometimes there is an unnecessarily prescriptive approach leading to burden and cost on GA. An example is the requirement for repeated permissions to carry out activities such as air displays, where organiser competence is established and format is unchanged. If rules were simplified as indicated in the GA Policy Framework, and given the current approach to recognising a different acceptance of risk, the application of the regulatory tools would be changed, generally moving to a simpler means of regulation.*

**Question 3:** - Do you have any ideas for how regulatory functions could be discharged in a more effective manner for the GA community? Please give examples.

*GA Alliance approve the motivation and thrust of the consultation document, that is to reduce the burden on GA. Reduction in unnecessary regulation, improved clarity of regulation and delegation to competent bodies such as the GA associations are examples of the proper approach. The direct involvement of industry associations in developing means of compliance is also desirable.*

**Question 4:** - Are there any areas of GA activity in which industry could take further responsibility for risk management? Please answer yes or no. If yes, please give examples.

*Yes. The major GA associations such as the BGA, BMAA and LAA are competent bodies which have proven ability to effectively administer the great majority of the UK national aircraft in terms of risk management for initial and continuing airworthiness. We should also note the effective voluntary self-regulation of their areas by BGA, BBAC and BHPA.*

**Question 5:** - Could more regulatory functions be delegated to industry? Please answer yes or no. If yes, please give examples.

*Yes. As well as airworthiness, the major associations also have considerable actual and/or potential capabilities in pilot licensing, training and the regulation of flight operations. The CAA should focus on working in partnership with GA industry associations to achieve a low-cost regulatory regime.*

**Question 6:** - Are there any new enabling provisions for particular activities that should be adopted,

to be reflected in a future ANO? Please answer yes or no. If yes, please give examples.

*Yes. It is important that developing technologies in GA (which is often most advanced in aviation innovation and not restricted by unnecessary regulation. For example, there should be mechanisms within the ANO that permit new technologies (e.g. solar-powered flight) or existing technologies (e.g. miniature gas turbine engines) to be adopted and developed without undue restriction.*

**Question 7:** - Do you believe that we have adopted the correct principles for our levels of regulatory intervention in GA? Please answer yes or no. If necessary, please give examples why.

*Yes. A problem for much aviation regulation is that changes in technology (e.g. glass cockpits, new forms of motive power) make them outdated. An effective approach for many areas is that currently being jointly taken by EASA and FAA in updating CS-23/Part 23, which involves the regulator setting out the regulatory aims while approved industry groups are delegated to maintain and update the means of compliance.*

**Question 8:** - Are there any particular areas of regulation, particularly in the ANO, which could be simplified, while continuing to have the same effect? Please answer yes or no. If necessary, please give examples.

*Yes. There are several areas of the ANO which contain too much detail, for example the extensive sections on airworthiness and equipment. These can be simplified using the approach suggested in the answer to Question 7 above.*

**Question 9:** - Are we taking the correct approach to the construction of the future ANO and the associated regulatory material? Please answer yes or no. If no, please explain what approach should be taken.

*Yes.*

## **Flight Operations**

**Question 10:** - Would the alignment of operational definitions for EASA and non-EASA aircraft assist understanding of the relevant operations requirements? Please answer yes or no. If necessary, please explain why.

*Yes, for the good reasons outlined in the consultation document, and also because UK non-EASA aircraft frequently travel to other European countries and such alignment will ease compliance with overseas regulation.*

**Question 11:** - Would this alignment save time in understanding the regulatory requirements and (if applicable) explaining them to your customers? Please answer yes or no. If yes, please give details of how much you think it would save.

*Yes. This conclusion follows naturally from the answer to Question 10, but it is not easy to quantify the extent of time that might be saved.*

**Question 12:** - Is it logical and beneficial to adopt broadly similar operations rules for both EASA

and non-EASA aircraft? Please answer yes or no. If necessary, please give examples why.

*Yes. Using different rules is a recipe for confusion especially for anyone who has to operate and pilot both EASA and non-EASA types. Many of our association members are in that position and need clarity and alignment of definitions and regulations. However, if EASA operations rules are not proportionate or appropriate (as is the case with several) we would not always wish to harmonise.*

**Question 13:** - Would the alignment proposal have any financial effects on you? If so can you quantify them in terms of time or money?

*Yes. Although it is difficult to quantify, there may be some initial extra expense in rewriting manuals and training materials, etc., however this is a one-off cost which should be born for the sake of the anticipated benefits.*

**Question 14:** - How much time do you spend checking operational regulatory requirements?

*Most pilots of GA aircraft will refer to operational regulatory requirements on a regular basis, especially in a period of change (e.g. SERA). Unlike commercial pilots, who often benefit from operation manuals prepared by their employers, many association members will develop, document and review their own operational procedures. This may take considerable time and effort for the individual, and some may not keep up-to-date. In addition, GA pilots often have to address complex regulatory questions at short notice, such as 'In these weather conditions, will it be legal to fly VFR in the Class D airspace ahead?'*

**Question 15:** - Would the 'Skyway Code' concept be a useful mechanism to help GA pilots understand the practical application of regulatory requirements? Please answer yes or no. If no, do you have any views on alternatives? *An appropriate update methodology would be helpful.*

*Yes. A simple Skyway Code that could be easily referred to when making operational decisions would be of benefit. The selection and editing of content will be something of a challenge. Previous efforts (e.g. LASORS) were well-intentioned but simply too large as they included all relevant regulation as well as guidance. Obviously a version suitable for downloading to tablet computers will be popular, but a robust printed version will also be useful. On-line only materials are fine when sitting at home, but on a windswept remote airfield they are usually inaccessible due to lack of an adequate data link.*

**Question 16:** - If regulatory requirements were available in a single publication, such as a Skyway Code, what proportion of this time do you think you could save?

*This question is misguided and almost impossible to answer. There will be a saving, but any attempt to quantify it will probably produce a spurious answer. See our general comments above.*

**Question 17:** - Is the less prescriptive approach to the issue of towing and dropping a sensible one? Please answer yes or no. If necessary, please give details why or any alternative approaches.

*Yes. However, we have two important points: Firstly, the new approach should not disadvantage glider towing in any way, and specific detailed consultation with the BGA and BHPA is essential.*

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*Secondly, the requirement for individual permission to drop objects is one frequently held up as an example of over regulation, and should itself be dropped.*

**Question 18:** - What future involvement should we have in the regulation of parachuting itself, as opposed to the operation of the aircraft involved? Please explain any alternatives that should be considered.

*The GA Alliance believe that permissions for parachuting activities should continue to be required, for the purposes of airspace management, the safety of parachutists and all GA operations. On other matters, specific questions concerning the regulation of parachuting should involve detailed consultations with the BPA.*

**Question 19:** - Are the current regulations proportionate for smaller flying displays? Please answer yes or no and give examples why.

*No. The current regulations make proper provision for larger displays or those where aerobatics are to be flown, but organised fly-bys (for example low passes by vintage, microlight or amateur-built aircraft) where the public are present are also covered, and the current regulations are disproportionate for these. This has meant that the organisers of smaller UK fly-ins, etc. do not apply for permission and as a result these events have relatively little interest compared with those in some other countries.*

**Question 20:** - Would there be advantages in the legal basis for flying display director permissions simply becoming exemptions under the Rules of the Air? Please answer yes or no and explain why.

*Yes, with the addition of straightforward guidelines for smaller events this would be a useful method for simplifying the regulations. However, the definition of 'displaying' could be amended to allow pre-arranged fly-pasts and non-aerobatic performances by individual aircraft to be carried out by pilots with appropriate experience and currency.*

**Question 21:** - Could a system for ensuring the competence of display pilots become purely an industry function? Please answer yes or no and explain why.

*Yes. However, it has to be accepted that it is currently fit for purpose and effective at delivering the necessary controls. An industry body that appeared to favour certain individuals without ensuring standards and the regulatory criteria are met would not be a suitable solution. This would suggest that some form of approval would be required. However, delegation of powers to that body, without further referral to the CAA would remove a need for direct oversight and a simplified process.*

**Question 22:** - Could a less prescriptive approach be taken in this area of aerial activities such as kites, glider launching and small balloons? Please answer yes or no and explain why.

*Yes, but with important provisos. 1) There must be continued protection from threats near flying sites (including small farm strips, etc.) Tethered balloons, etc. have sometimes been used to discourage use of legal GA flying sites by local protesters. 2) There is an increasing threat from remotely-piloted drones and collisions with GA aircraft have occurred. It is essential that the regulations make specific provision to protect GA aircraft against these threats.*

**Question 23:** - Would this less prescriptive approach lead to any time or cost savings for you? Please answer yes or no and give examples.

*Yes. It may be the case that semi-permanent NOTAMS are promulgated where there is little or no actual kite or balloon activity, perhaps to discourage GA overflight. Too many NOTAMS of limited relevance to GA tends to waste time and distract attention from the vital few.*

**Question 24:** - Would having the ability to issue a permission to operate in the service of the police, without an Air Operators Certificate, be a reasonable approach to take to this issue? Please answer yes or no and give reasons why.

*Yes. GA organisations assisting the civil authorities (including the Coastguard) can provide valuable services, as demonstrated in other counties where regulations are less stringent.*

**Question 25:** - Would allowing such a permission be economically beneficial to your activities? Please answer yes or no and if yes give estimates.

*No. In all likelihood, the organisations concerned would be primarily voluntary.*

**Question 26:** - Is it reasonable to not have detailed flight time limitations for non-commercial operations? Please answer yes or no and explain why.

*Yes. The main purpose of flight-time limitations is to protect the travelling public from tired pilots. We entirely accept the points made in the consultation as to why these limitations should be removed from GA non-commercial flight.*

**Question 27:** - Should hours flown under non-commercial operations rules, including flight instruction, count towards commercial air transport flight time limitations? Please answer yes or no and explain why.

*No. Many airline pilots fly GA aircraft non-commercially, for relaxation and enjoyment. If such a pilot was considering a very demanding GA flight that might rendered them unfit to conduct their commercial work, they would be responsible as a professional for managing any impacts and if necessary declaring them to their employers.*

**Question 28:** - Would revising the requirements change how many hours you flew? Please answer yes or no and explain why.

*Yes, this will make a difference to a number of pilots. GA will benefit from the increased activity of experienced professionals pilots.*

**Question 29:** - Would it be appropriate to have lower or less prescriptive state runway visual range minima for non-commercial, non-complex aircraft than are required for commercial air transport? Please answer yes or no and explain why.

*Yes. When flying a light aircraft non-commercially, the instrument-rated pilot should not be bound by regulations appropriate for a heavy airliner, The consultation document clearly explains the greater flexibility that should rightly be afforded to smaller, lighter aircraft making instrument approaches.*

**Question 30:** - Should the approach taken by Part-NCO to equipage and instrumentation, apply to non-EASA aircraft as well? Please answer yes or no and give examples why.

*Yes. Alignment with Part-NCO will reduce complexity and enhance interoperability. When considering the PBN specifications, it should be appreciated that instrumentation/avionics represents one of the most significant development points in modern aviation. Non-certified equipment is often more technically advanced than of certified equipment. The CAA should consider setting out the general aims in terms of performance, using an industry group to review the detailed PBN specifications and make equipment recommendations. Where Part NCO is more onerous than current requirements, this group should be enabled to exempt non-EASA aircraft.*

**Question 31:** - Would aligning the requirements have any financial impact either positive or negative? Please answer yes or no and give examples.

*Yes, but the impact depends on the individual aircraft fit. With sensible exemptions for existing aircraft as proposed, the impact will be minimised. Very few pilots nowadays seek to fly IFR with only a turn-and-slip. For Permit to Fly aircraft such as the LAA amateur-built fleet, the level of equipment for those currently seeking IFR permissions is already high, the major issues concern other matters.*

**Question 32:** - What should be the approach to the licensing of non-EASA aerodromes, considering that the EASA Air Operations Regulation requires that operators establish the adequacy of aerodromes before using them, whether licensed or not?

*The CAA should review its detailed approach to aerodrome licensing, as there is anecdotal evidence to suggest gold plating and unnecessary bureaucracy in the application of the regulations. This leads to excessive cost for aerodrome operators who then choose to become unlicensed. The current CAA licensing approach has relaxed the regulations regarding training on unlicensed aerodromes to an adequate degree. Commercial flight training in larger aircraft should ideally take place in a more regulated environment, hence licensing is of value.*

**Question 33:** - If aerodromes were no longer required to be licensed in order to accept commercial air transport flights, would this have any financial impact? Please answer yes or no and give examples why.

*Yes. Public Transport operators (Section 96 ANO) are required to satisfy themselves that aerodromes are adequate for the safety of passengers. They can make provisions (for example to bring in additional fire cover) for occasional CAT flights. This enables flexibility, where it is of financial benefit. The regular use of unlicensed aerodromes for CAT would also become a possibility, if the protection of traffic was enabled by controlled airspace (CAS). Such CAS might be pre-existing, but the prospect of low-cost airlines applying for CAS in order to set up a minimal cost operation at an unlicensed aerodrome cannot be ruled out. With the current Airspace Change Process it might indeed be granted! Cost-cutting by CAT operators at the expense of airspace freely available to GA is opposed by GA Alliance.*

**Question 34:** - How should we decide on the establishment or retention of ATZs? Please give examples.

*There has been a noticeable trend for aerodromes to become unlicensed. Unlicensed aerodromes currently have no ATZ protection for local traffic. Combined with the reduction in such airfields having A/G radio (due to recent OFCOM fee impositions) this has led to safety concerns among some GA users. There is evidence of transiting aircraft, including large military aircraft, apparently ignoring the presence of unlicensed flying sites. The knock on effects of ATZ removals because of the removal of the requirement for training to be from licenced airfields, coupled with the recent chart symbology changes for airfields with training or unusual activities need to be studied for safety implications."*

**Question 35:** - Do ATZs still provide a safety benefit? Please answer yes or no and explain why.

*Yes. They discourage passing traffic from approaching the traffic circuit and require joining aircraft to conform to the standard traffic pattern, hence reducing the risk of collision.*

**Question 36:** - Is the current model of sub-ATC air traffic services the most effective? Please answer yes or no and give examples of how it could be improved on.

*No. There is often a tendency for AFIS to act as though they were ATC, and A/G in some places to act as if they were AFIS. There is widespread confusion among GA pilots, as to whether they are being instructed or informed by the air traffic service. At smaller flying sites there is often an unmanned (or perhaps worse, semi-manned) frequency with inconsistent procedures (e.g. local aircraft calling 'AAA Traffic' while joining aircraft try to raise 'AAA Radio'.) A more consistent approach is needed to reduce this confusion which can have safety implications.*

**Question 37:** - Should we consider entering unlicensed airfields into the AIP? Please answer yes or no and explain why.

*No. The current position is satisfactory. There is little problem in practice in obtaining adequate information from flight guides and online. Collection of the necessary information (obstructions, etc.) for an AIP entry would be expensive.*

**Question 38:** - Why, as a GA airfield operator, do you continue to maintain a licence? Please give examples.

*N/A – for aerodrome operators only.*

**Question 39:** - Would any of the changes outlined above have an effect on whether you maintain a licence? Please answer yes or no and give examples why, including any financial considerations.

*N/A – for aerodrome operators only.*

**Question 40:** - We have chosen to issue a general permission for remunerated flight training in non-EEA registered aircraft that are privately or group owned. Should this alleviation be taken further? Please answer yes or no and give examples why.

*No. Although there is no safety reason why non-EEA aircraft owned by commercial organisations*



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*should not undertake remunerated flight training, the effect would be to remove a barrier to entry into the struggling UK commercial flight training market. This could prove harmful to UK GA.*

**Question 41:** - What future form do you think Article 225 should take? Please give examples

*This question is not relevant to GA Alliance*

**Question 42:** - Would the removal of any of the requirements related to Article 225 have an associated economic benefit? Please answer yes or no and give estimates.

*This question is not relevant to GA Alliance*

### **Airworthiness**

**Question 43:** - Would the use of the 'Special category' CofA be an effective way to bring greater scope and clarity to commercial operations of aircraft without an ICAO CofA? Please answer yes or no and give examples why, including aircraft it could be used for.

*Yes, this excellent proposal offers scope for new flexibility in the use of national aircraft which should benefit UK GA.*

**Question 44:** - Would the use of the 'Special Category' CofA enable you to reduce costs of doing business or allow expansion into new areas of work? Please answer yes or no. If possible, please give estimates.

*Yes. There would be potential benefits for several GA Alliance member associations to a more flexible airworthiness approach to national aircraft, perhaps especially to the LAA, but also perhaps concerning aircraft used for glider towing and parachuting. There will also be many niche commercial opportunities within GA more widely. It is difficult to quantify the increase in economic activity that will result, but there is little doubt that benefits will follow*

**Question 45:** - Should more flight training in permit aircraft be permitted? Please answer yes or no and explain why. If yes, please state the circumstances, e.g. ab initio, recurrent etc.

*Yes. Ab initio PPL training is the starting point for all commercial pilot training and is especially vital to GA, yet the number of ab initio students continues to decline. The flight training industry in the UK has long been handicapped by (among other factors) a high-cost environment, compared with overseas competition. The permit aircraft now available are more attractive to students than the ageing traditional certificated trainer. The use of permit aircraft for training offers the opportunity to reduce purchase, maintenance and fuel costs while maintaining safety levels. This should allow lower hourly costs and hence increased business. It is also allowed in other EU states – notably France.*

**Question 46:** - If remunerated flight training were allowed in permit aircraft, please provide estimates of the effect on your business.

*This question is not relevant to GA Alliance*

**Question 47:** - Should we remove the requirement for maintenance schedules and logbooks to be approved by us? Please answer yes or no and give reasons why.

*Yes. This level of detailed intervention is a good example of unnecessary bureaucracy.*

**Question 48:** - Would such a change in maintenance requirements bring financial savings? Please answer yes or no and, if yes, give estimates.

*Yes. The introduction of a simple maintenance schedule suitable for small simple aircraft is overdue. For example, LAMS includes numerous maintenance items (perhaps 30-40% of the total) that are irrelevant to simple permit types, but sometimes fails to include items relevant to more recent technologies. This can lead to confusion, unnecessary work and additional cost to the owner.*

**Question 49:** - Comparing the UK approach and that for EASA aircraft, which provides more utility for pilot owner maintenance and why?

*GA Alliance advocates the EASA approach, providing general maintenance objectives and tasks supported by alternative means of compliance (AMC). This allows the separation of objectives and potentially allows for industry involvement in the development of AMC.*

**Question 50:** - What would be a reasonable approach to defining the scope of pilot owner maintenance? Please give examples.

*Pilots vary from those who have no knowledge (or interest) beyond the basic checklist tasks (such as oil level) to those who have personally constructed an aircraft from the plans and installed all of its systems. Defining the scope of pilot owner maintenance should not be predicated on the former, but should be developed at two levels. The first level will include a scope suitable to the involved owner of a factory-built permit aircraft, who may wish to develop and exercise skills equivalent to car maintenance. The second scope should be equivalent to the Sec. 65.104 FAA repairman certificate (experimental aircraft builder), for those who have constructed an aircraft and wish to maintain it themselves.*

**Question 51:** - Would the ability to use 'A conditions' under circumstances in which an aircraft did not have a valid permit to fly be of benefit? Please answer yes or no and explain why.

*Yes. Just as it is for certificated aircraft! It is especially useful where an aircraft's permit has expired and it requires to be flown to a maintenance organisation for full inspection and maintenance work.*

**Question 52:** - Would the use of 'A conditions' under circumstances in which an aircraft did not have a valid permit to fly have potential financial savings? Please answer yes or no. If yes, please give estimates.

*There are many circumstances where permit aircraft can be safely flown for a short distance under 'A conditions', where the alternative might be very expensive dismantling and ground transportation, perhaps with associated damage. This cost can amount to many thousand of pounds. These considerations are particularly relevant for larger older aircraft and ex-military types.*

**Question 53:** - Would 'designees' be a useful feature of the airworthiness system in the UK? Please answer yes or no and give reasons why.

*Yes. GA Alliance associations including the BMAA and LAA could see opportunities to appoint experts (staff engineers or members with specific technical knowledge) in designee roles. This would give more flexible opportunities for the CAA to delegate airworthiness tasks associated with initial and continuing airworthiness, including modifications. However, the legislative structure and accountabilities in the USA differ and do not necessarily translate into the UK system. US experience has shown certain problems with the designee system which should not be replicated were it introduced in the UK.*

**Question 54:** - Could there be financial savings or business opportunities associated with the use of designees? Please answer yes or no and, if yes, give estimates.

*Yes, the maintenance industry will see opportunities where businesses have developed specific expertise (for example in vintage types) for key individuals to take on designee roles, hence reducing the need for CAA involvement in, for example, modifications. This will decrease costs (particularly CAA fees and charges) and enhance flexibility in maintaining the airworthiness of vintage and historic aircraft.*

**Question 55:** - Would any GA organisations be interested in performing issue of permit to fly documentation? Please answer yes or no. If possible, state who and give reasons why.

*Yes. Both the LAA and the BMAA have indicated an interest in undertaking this activity. In each case, the association issues permit documentation on behalf of the CAA, while actually undertaking the vast majority of the necessary work themselves and paying the CAA for the privilege. For many years this was a fairly nominal fee but recently, the CAA have attempted to recover costs from this activity. If suitable processes (under A8-26 or otherwise) can be agreed, this offers an excellent delegation opportunity.*

## **Pilot Licensing**

**Question 56:** - Are any of the modifications and simplifications proposed for the NPPL worth pursuing? Please answer yes or no and give reasons why.

*Yes. All of these options have potential benefit, because they simplify the NPPL administration, allow more potential for delegation. In addition we welcome the intent to widen the privileges of the license. This will make the NPPL more attractive to new recreational pilots as a cheaper and less demanding alternative to a PPL.*

**Question 57:** - Could there be financial benefits from pursuing any of the NPPL options proposed? Please answer yes or no and, if yes, give estimates.

*Yes. A better NPPL with more extensive privileges would appeal to a greater number of actual and potential pilots, helping to reverse the decline in UK pilot numbers and supporting the GA industry. In many instances the NPPL is an initial licence. However, many are pilots who have previously held a PPL or commercial licence, but are no longer able to meet the medical standards required*

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*for those licenses or choose, for personal reasons (eg retirement), to fly S&RA aircraft on a reduced lower cost licence. Although not part of this consultation, it should be noted that any changes to medical standards that reduced this advantage of the NPPL would be counter-productive.*

**Question 58:** - Would any organisations wish to become approved to perform tasks such as issuing the NPPL? Please answer yes or no. If possible, state who and give reasons why.

*GA Alliance is unable to answer definitively on behalf of member associations, but it is worth exploring this avenue with the BMAA and the LAA. It should be noted that these associations are currently processing NPPL applications and could readily develop that service to actually issue the licences. This would reduce CAA involvement and cost, while providing a minor income stream to the associations. Conceivably, the necessary approval might be developed as an addendum to the A8-26 airworthiness approvals currently in progress.*

**Question 59:** - Should the privileges of UK licences be aligned with those of their EASA equivalents? Please answer yes or no and give reasons why.

*Yes. For clarity and simplicity in regulation. Previously, for example, many PPLs were unsure of the visibility requirements because there were overlapping regulations. In some cases there are significant benefits of the EASA privileges compared with those of the traditional UK PPL. However, care is needed because within EASA licensing there are challenges, e.g. differences in maintaining LAPL's and PPL's. Part FCL is prescriptive and bureaucratic in comparison with the NPPL. Avoiding over-bureaucratic elements while maintaining the basic alignment of privileges is the best course.*

**Question 60:** - For SDR types and the range of lighter aircraft below that, for example paramotors, what training and licensing requirements should be applicable? Please give examples.

*The GA Alliance member associations agree that all pilots of all aircraft should be required to undertake training appropriate for the complexity of the class of aircraft that they intend to fly and/or their likely interaction with regulated airspace and other airspace users. GA Alliance member associations are fully aware of these issues and will address this question in their own responses to the ANO review. They should be consulted as to appropriate training and licensing requirements. This is an excellent area for the introduction of an ANO rule couched in terms of safety objectives, together with an industry/association working group to develop and review the AMC in partnership with CAA.*

**Question 61:** - Could you see any financial benefits from removing the requirement to hold a formal licence for small single occupant aircraft? Please answer yes or no and, if yes, give estimates.

*No. There must be appropriate training for all pilots. Any limited financial benefit to the individual, if training was not required, must be set against the wider safety issues and resultant costs were untrained pilots permitted to operate.*

**Question 62:** - Should the scope of privileges that third country licence holders can exercise in non-EASA aircraft registered in the UK be expanded? Please answer yes or no and give reasons why.

*Yes. Third country license holders should be able to exercise all the normal privileges of their overseas licence as if they held a UK national licence, when flying UK national aircraft. Specifically, if a national aircraft is permitted by the CAA to operate in the UK under IFR, a pilot holding an ICAO-complaint third country IR should be allowed to operate it under IFR in CAS. Thus, it would become legal to divert in IMC to a major airport within CAS, a valuable safety benefit. Similarly, those holding foreign instructor rating should be able to give instruction in UK national aircraft. These expanded privileges would remove unnecessary restrictions on the limited number of aircraft involved and allow their pilots to be trained safely without unnecessary expense. However, there also ought to be an easier path for validation or for country-to-country recognition of qualifications for conversion.*

**Question 63:** - Would an expansion of the scope of third country licence privileges have any financial impacts? Please answer yes or no and, if yes, give estimates.

*Yes. The primary impact would be on the training of pilots to fly UK national aircraft, especially where there are few pilots qualified on type.*

**Question 64:** - Is it appropriate to introduce more flexibility in terms of who can own a UK registered aircraft? Please answer yes or no and give reasons why.

*Yes. Historic restrictions which serve little current purpose should be removed, if they tend to restrict GA activity.*

**Question 65:** - Could this flexibility in ownership have financial benefits? Please answer yes or no and if yes, give estimates.

*Yes. Flexibility in ownership will promote more GA flying in the UK, bringing more business to a wide variety of aviation-related businesses. It is impossible to estimate the effect in financial terms until there is some indication of the numbers of aircraft that will be involved, etc. Joint ownership should be encouraged through minimum requirements.*

**Question 66:** - Have we correctly applied the principles set out at the start of the document in determining which areas of the ANO are worthy of revision and the proposed alternative approaches? Please answer yes or no and give reasons why.

*Yes, in general the GA Alliance supports the approach taken to the ANO review, which are clearly based on the principles in the GA Policy Framework. There has clearly been a great deal of work necessary to cover such broad range of topics. The alternatives presented are generally well thought through and worthy of support. We would point again to our general comments at the start of this response.*

**Question 67:** - When considering the powers and obligations we have under the ANO, are they appropriate? Please answer yes or no and give reasons why.

*Yes. A NAA should have adequate powers to undertake its necessary obligations, and the GA Alliance generally agrees that the retained powers are reasonable. Some of our member associations may have specific points to make in this regard and it is very likely that in the future a further review may be necessary. It would be good practice to schedule (in two or three years), and*

*indeed we would expect, a follow-up review of the impacts of the implemented ANO changes, to include consideration of whether any further areas require deregulation or delegation.*

**Question 68:** - Have we drawn the correct conclusions on the areas of the ANO for which the substantive meaning should remain the same? Please answer yes or no and give exact reasons why.

*Yes.*

**Question 69:** - Are there any areas in which we should have drawn different conclusions for or have missed? Please answer yes or no and give exact reasons why.

*No.*

**Question 70:** - Have we missed any exemptions or current policy that could be included in the future ANO? Please answer yes or no and give reasons why.

*No. We have no specific additional items at present but we do again urge the need for a timely follow-up review, to catch any items that might become apparent when the current changes are implemented. We place particular value on the proposed Article 23 (Type Approved Permit Aircraft) and urge that is rapidly addressed, to facilitate flight training in permit aircraft.*

**Question 71:** - Please highlight any reasons to keep the provisions that we have decided have no further purpose?

*None.*

Prepared for GA Alliance by J. Tannock

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