

General Aviation Alliance – Response to EASA NPA 2008 – 17B

This response to the NPA 2008 – 17B is made by the United Kingdom General Aviation Alliance (GAA)

The GA Alliance (GAA) is a group of organisations representing the interests of many in the UK General Aviation Industry (GA). It was formed in 2004 due to concerns about the fragmented representation of GA and the need for co-ordinated UK level responses to CAA and EU initiatives, the latter through Europe Air Sports.

The term General Aviation (GA) describes all aviation activity except airlines and military i.e. a civil aircraft operation other than a commercial air transport operation. The principal sectors of the GA industry include sport and recreational aviation (S&RA), personal transport for business and private purposes, flying training, corporate aviation, aerial work and a wide range of ancillary activities from maintenance to airport services. There are approximately 7,500 UK registered and certificated plus 1,000 USA registered GA powered aircraft in the UK (incl. approximately 1,000 helicopters), 2,300 microlights, 2,600 gliders, 740 balloons/airships, 62 gyroplanes plus 5,500 hang and paragliders and approximately 1,000 UK civil airliners. In addition parachuting activities are within the scope of CAA regulation as well as aero-modelling.

Members of the General Aviation Alliance include:

- British Balloon and Airship Club (BBAC)
- British Gliding Association (BGA)
- British Hang Gliding and Para Gliding Association (BHPA)
- British Microlight Aircraft Association (BMAA)
- British Parachute Association (BPA)
- Helicopter Club of Great Britain (HCGB)
- Light Aircraft Association (LAA)
- PPL/IR Europe – European Association of Instrument Rated Private Pilots
- Royal Aero Club of the United Kingdom (RAeC)

The General Aviation Alliance coordinates about 72,000 subscription paying members of these bodies.

In the United Kingdom aviation activities are diverse. Some activity is regulated by the UK Civil Aviation Authority, some such as gliding is self regulated, run by the British Gliding Association, and some is completely unregulated such as foot launched powered flying where no central organisation exists to regulate or self-regulate.

Despite the diversity of activities and the differences in regulatory oversight the flight safety record in the United Kingdom is excellent.

The member Associations of the GAA have much experience in the fields of training and regulation of aviation activity. It is with the background of this experience and expertise that member organisations have individually responded to this NPA adding the detail with which they are familiar. This response from the GAA seeks to confirm the general areas upon which all the member Associations have experience and are in agreement as representatives of our 72,000 members

General comment NPA 2008-17 B:

Overriding Principles

1. That EASA has been tasked with developing the pilot licensing system is accepted however EASA must recognise that the licence system developed and proposed for adoption must be relevant and proportionate to the aircraft, pilot and flight activity throughout.

General Aviation Alliance – Response to EASA NPA 2008 – 17B

2. The GAA support the development of a Leisure Pilot Licence for the purpose of encouraging new entrants into recreational flying. The LPL training requirements must be sufficient for the privileges sought but not seek to add additional requirements.
3. The LPL must be capable of being a stepping-stone towards a higher licence without penalty so that a holder can take full credit for training for an LPL forward towards the grant of additional qualifications.
4. The EASA pilot licensing system should seek to conform to recognised international standards that have been developed over many years of experience and use. The system must not increase or add complexity to requirements without a proven safety justification.
5. EASA should recognise the safety record of the current licensing systems in use and not try to increase requirements unless to address some recognised and proven current unsafe practice.
6. The EASA pilot licensing system should recognise the validity of ICAO licenses and give full credit to holders of those licenses wishing to obtain an EASA qualification.
7. The EASA pilot licensing system should recognise the validity of non-ICAO compliant Nationally issued licenses and give full credit to holders of those licenses wishing to obtain an EASA qualification. This is particularly important for applicants for the PPL and proposed LPL.
8. The EASA licensing system should believe in the value of examination for establishing and proving levels of knowledge and practical skills and establish agreements to accept the conclusions of other licensing systems as an alternate to its own.
9. The EASA licensing system should believe in the value of examination for establishing and proving levels of knowledge and practical skills and rely on this means of proving conformity to requirements when granting certificates having taken into account previous experience.
10. The EASA licensing system should recognise that all pilots achieve a level of operational and skill based experience and that when adding to their privileges credit should be given for this experience. Only training in areas of which the pilot has no previous training experience should be required when seeking to obtain a variation of a licence or certificate. All proposed credit requirements must be reviewed by people with practical flight experience in all classes of aircraft for which EASA Licenses will be available.
11. The EASA licensing system must recognise that it is a truly Member State-wide system and should not include any element of regulation which seeks to constrain any privileges or experience gained in one State being recognised in any other.
12. Requirements for the maintenance of ratings and certificates must be as uniform across the licence system as possible so as to avoid confusion and to establish standardisation.
13. Requirements for the renewal of qualifications must recognise the value of experience and not only be time dependent.