

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

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 2008-17C :

Overriding Principles

- 1. The UK GAA supports the development of medical certification appropriate to the activity undertaken.**
- 2. ICAO medical requirements for Commercial Air Transport are adequate and EASA should not seek to increase requirements on the basis of JAR without**

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

proving that certification standards in excess of ICAO standards improve flight safety.

- 3. A pilot's age should not be used as a reason to curtail licence privileges if they are able to hold the required medical certification.**
- 4. GAA support a lower medical certification standard requirement for the LPL. However a self declaration standard as currently used in the United Kingdom with the National Private Pilot's Licence supported by the holder's general practitioner is more appropriate than the medical examination proposed in this NPA and has proved to be successful.**