

## DRAFT NOTES OF MEETING

### LIGHT AVIATION AIRPORTS STUDY GROUP Aviation House, Gatwick 31 March 2005

Attending:	Graham Forbes	CAA PLD	Chairman
	David Beaven	CAA GAD	
	Dr Robert Hunter	CAA Medical	
	Paul Fleming	CAA ASD	
	Geoff Parker	CAA FOD	
	Mark Smailes	CAA DAP	
	Joji Waites	CAA SIDD	
	David Corbett	GASCo	
	Chris Finnigan	BMAA	
	John Haffenden	AOA/BBAC	
	Janet Hoare	BBGA/BHAB	
	Dorothy Pooley	GAPAN	
	Terry Slater	BGA	
	Barry Tempest	PFA	
	John Walker	AOPA	
	Inez Bartolo	CAA ASD	Secretary
Apologies:	Geoff Caton	CAA ASD	
	Gary Phillips	CAA ASD	
	Tim Scorer	GA Airfields	
	Ben Alcott	CAA SIDD	
	Gary Beaton	CAA ATSSD	

#### 1. WELCOME

GF welcomed members to the second meeting of the LAASG, advising that Geoff Caton has relinquished his role as Chairman due to other commitments and that future meetings will be chaired by GF, who has assumed the role.

#### 2. MINUTES OF PREVIOUS MEETING

JH requested that the minutes show she represents both BBGA/BHAB and not just the BBGA. The minutes were then agreed.

**Action Item 8: IB**

#### 3. ACTION ITEMS FROM PREVIOUS MEETING

##### JOHN WALKER: PROPOSED CHANGES TO ARTICLE 101

JW offered a slide presentation to the Group (Paper - Proposed Changes to A101). This Paper had previously been distributed to the Group. The Paper proposes that aircraft <5700kg MTWA operating for the purposes of aerial work would be required to operate from a licensed aerodrome under a new standard based on sections of the existing CAP168, entitled CAP 168 Part II. Aircraft >5700kg MTWA would be required to operate

from a licensed aerodrome under CAP 168 Part I. The Paper also proposes that aerodrome audits occur every  $\pm 5$  years with no annual fee, instead of the current 15-18 month cycle. However, a fee would be payable for the audit, unless the aerodrome had opted out of the scheme. JW's investigations concluded that some aerodromes are unhappy with self-regulation and require an audit from an external body.

GF summarised the points raised in JW's Paper:

- Cost is driver of concern
- Recognises that present regulatory framework has come about through history, therefore somewhat complicated.
- Paper is proposing two parts (Part I applies to  $>5700\text{kg}$ , Part II applies to  $<5700\text{kg}$ )
- CAP 168 Part II would still involve 'licensing', or consideration given to 'certified'
- Proposal to look at RFF
- Proposal to look at safety record (damage to third parties)
- Acceptance that there could be an audit, plus an initial fee, but no annual fee.
- Proposal to delegate the task of auditing to Industry

### **Comments on Paper**

**ASD:** In the past the CAA have held reviews and debates regarding licensing at the 'smaller' end of the aviation industry, but haven't come to any firm conclusions. ASD consider this Paper is very welcome, and would like to encourage more discussion along this theme. However, PF stated that ASD would not welcome the idea of CAP 168 "Pt I and II", believing it is important to maintain one standard, not two. Also there may be 'aerodromes' that sit in the middle (grey) area between the two.

**Flight Ops** GP commented that there are a few gaps in the Paper with regard to aircraft operations less than 5700kg, reminding the Group of the importance in addressing the issue of what will apply to aircraft  $<5700\text{kg}$  conducting public transport. In addition, the Paper is based on 'licensed' aerodromes (whether Part I or II) but it is also important to mention unlicensed aerodromes because public transport can, under very limited conditions, be operated from unlicensed. Flight Ops Dept are not concerned with Part I or II, only concerned with whether aerodrome is licensed. The CAA places a number of responsibilities on the operator of the aircraft, for example Article 34 (operators) applies to all aircraft operators and all flights being used for public transport anywhere in the world. This applies to all aircraft, all sizes, whereas Article 101 (aerodromes) grades them down to below 2730kg. CAP 393 (Air Navigation) Section 3, Regulation 15 should also be taken into consideration as it applies to public transport above 5700kg. It is important to remember that the CAA would not wish to grade things through the AOC, but would continue to say to the operator 'you must assure yourself that an aerodrome is suitable for your size of aircraft'. GP also stated the importance of remembering that the CAA is now locked into the European system and there are certain requirements that are currently being translated into EU-OPS (due to go before the Council of Ministers in June 2005). There will be a future European regulation that may dictate what is required at an aerodrome. GP stated that he would be happy

to see all aircraft having to use a licensed aerodrome, regardless of whether they are cargo, public transport etc. This would be much simpler than the existing Article 101, although may affect those below 2730kg.

- SIDD** Would be happy to supply data for RFF/accident stats.
- DAP** Speaking from an airspace perspective, DAP are not involved in specific licensing, but would like to raise the issue of an 'airspace' knock-on effect if, all of a sudden, there were lots of aerodromes, currently unlicensed, that could qualify for a licence and may potentially want to be supported by an ATZ. ATZ applications are considered on a case-by-case basis and subject to industry-wide consultation. The advent of an additional, significant number of ATZs would not necessarily be viewed, in the round, as an enhancement to UK airspace arrangements. CAA licensing does not come hand-in-hand with an ATZ.
- Medical** Comments on fire and fire associated injuries. This year the CAA Safety Plan is addressing a helmet for aviation, specified down to a standard, which is quite lightweight, worn under a headset. For those looking at statistics it may be worthwhile to consider whether a flame proof suit may be worthy of discussion.
- GAD** Welcome the Paper very much and as a wish list, it is very helpful to know what Industry are looking for. However, GAD would like to stress that whatever is proposed must fit in with ICAO obligations under the Convention (from the top down) and ensure our solution fits with that. It must also fit in with EASA regulation for aerial work, because there is no point coming up with something that doesn't mesh with that. DB stated that whilst he has great sympathy with what Industry are asking for, there are many points in the Paper that he would take issue with.
- Licensing** GF stated he could see no problems from a licensing point of view.
- AOA:** There are some issues with Article 101 that need to be addressed. JF believes the issues surrounding CAP 168 –v- Article 101 need separating first and then addressing.
- PFA:** BT noted what was said about 'top down' (GAD comment), but firmly believes in 'bottom up'. Several points on Paper itself: BT commented that although the safety data information has been perfectly gathered, the analysis is not very well done when an expert looks at the information. Also concerned with item 4b of Paper, which may have the effect whereby aerial work and crop spraying must take place from a licensed airfield only. PFA would prefer to see flying training and aerial work not required to be done from a licensed aerodrome.
- GASCo** Will support anything provided that safety aspects are covered. GASCo would be happy to assist with statistic gathering, in support of SIDD.

**BHAB:** No objection to getting rid of temporary helicopter licence sites. There is very little in the Paper about helicopters; however BHAB are keen to raise the point that helicopters should not be made to fly from licensed airfields only, as this will be a retrograde step.

**BBGA:** Would like to raise the point that some airfields have permitted development rights (GDPO) and this must not be jeopardised, as it would be disastrous. On the issue of RFF, generally in agreement with Paper. One concern of BBGA is if you take out 80 aerodromes from the 140 currently licensed, this only leaves 60 left to pay ASD charges and they are particularly concerned that the charges will increase dramatically. JH has a particular interest in RFF and would like to volunteer to do a risk assessment on all fire categories currently in existence, if SIDD could help.

**Action Item 9: JH**

PF reminded JH that it is a requirement under ICAO Annex 14 that RFF is in attendance at certain airports and that it is Government policy that we apply ICAO Annex 14 standards. PF added that ICAO will be looking at the safety oversight of aerodromes in a few years time and whether or not the SARPs are applied, both in the UK and Europe. Notwithstanding this, PF noted that JH wished to undertake a risk assessment, but advised that it is ICAO that quote the rules.

**BMAA:** CF congratulated JW on Paper, however the Group he represents have concerns. Many members operate from unlicensed airfields, where there are no regulatory requirements; however, BMAA provide guidelines. Resource is an issue, as the proposed Paper could result in more staff travelling the country visiting microlight sites, which would place an additional burden and cost to the members. BMAA would prefer to see is a Code of Practice rather than a licence.

**Action Item 10: BMAA/BGA**

**BGA** Thought provoking paper. BGA almost wholly recreational, and costs are increasing. A proposal that gliding operations (training) would come under 'licensed' aerodromes would be unacceptable. BGA believe that recreational aviation should be excluded from aerodrome licensing as should flying training.

**Action Item 10: BMAA/BGA**

**GAPAN** From the training perspective, the Guild look after pilots starting right at the beginning, and have a lot of sympathy with comments from other members of the Group. The remarks coming back from those that have looked at the papers offer a fairly unanimous view that they are "anti" any increase in flying training licence or further burden on training.

#### **BARRY TEMPEST: TRAINING FOR NPPL AT UNLICENSED AERODROMES**

Proposal is straightforward. Although Paper was initially devised for NPPL it can equally be applied to PPL. JAR-FCL does not mention certification or licensed aerodromes, just lays down physical characteristics and windsock to be in view. BT feels it likely that EASA would take on that element of JAR-FCL. The rationale is that there are relatively few countries that require the licensed aerodrome for flying training.

BT believes CAP 428 (Safety Standards at Unlicensed Aerodromes) is an overkill, although recognises the latest version is 'watered down'. BT stated there is room for a Code of Practice that could be thrashed out round the table, primarily focused on the requirement reflected in JAR-FCL.

It was agreed that JH would initiate a Code of Practice sub-group and report progress back through LAASG.

**Action Item 11: JH**

In summary, BT's Paper is a proposal for removal of licence requirement, which has the support of other recreational Groups in the meeting.

GF proposed a checklist of 'issues' be drawn up by Sub-Group and forwarded to IB for inclusion on website and discussion at future meetings.

**Action Item 12: Sub-Group**

**Comments on Paper:**

**BBGA/BHAB** Issue is with the burden on the public transport flights if the need for licensing is removed.

**DAP:** An unlicensed aerodrome requires the support of an air traffic control or aerodrome flight information service unit (Rule 39 and Article 128 of ANO (interpretation of ATZ) refer). An initiative to allow flying training at unlicensed aerodromes might result in a number of aerodromes choosing to operate without a CAA licence. If such aerodromes were served with only air/ground they would not qualify for an ATZ. Any LAASG recommendation to allow flying training at unlicensed aerodromes would need to include a caveat relating to Rule 39 implications.

**GAPAN:** Feels there is a general assumption that 'licensed' is good, and 'unlicensed' is bad, which is wrong. It is important to look at statistics.

**SIDD:** It is possible to look at statistics at unlicensed aerodromes and would be able to provide data, if required. However, it would not be possible to compare accident rates at different aerodromes due to a lack of movement data.

**DAVID BEAVEN: UPDATE ON COMMENT FROM OTHER STATES**

Four responses received to date, although hopefully more data available by next meeting, where a pattern should develop. However, the information received so far indicates that our colleagues in other States do have their obligations under the Chicago Convention because almost everybody requires a 'certificated' aerodrome for international air navigation and public transport, but not for A to A flights; in that respect the UK are different. With regard to flying training – the answer is almost universally no, except Austria, who apply National regulation to all its aerodromes. Italy are slightly different (avio superfici). Certified aerodromes are not required for training, although some States have national code or regulation in place.

#### 4. FEEDBACK FROM INDUSTRY REPRESENTATIVES

**GAPAN:** Any increase in cost terms is seen as a bad thing. Regulatory 'increase' is seen as detrimental.

**BGA:** If costs are high, everyone will go to Europe to achieve aims (ie flying training in France cheaper than UK). Reduce regulation to lowest level, although accepting 'reasonable' aerodrome standards.

**BMAA:** There must be standards; however, licensing isn't the only way to achieve this. Code of Practice is a possible way forward. Happy to be regulated occasionally.

**PFA:** Gaining feedback is difficult. BT intends to put an article in the PFA magazine with the hope that people will respond.

**AOPA:** CAA should be involved in the process somewhere. General feedback is preference for a 'Code of Practice' but in the form of a CAP.

**AOA:** Generally support a light touch, but not to remove regulation as this could affect safety at airports. RFF should also be reviewed at small airports.

#### 5. METHODS OF COMMUNICATION/DISTRIBUTION OF PAPERS

All documents requiring circulation should be forwarded to IB through the LAASG e-mail address for distribution amongst the Group.

#### 6. ANY OTHER BUSINESS

It is hoped that Martin Marsh will attend future meetings representing PLD (author of Lasors).

JH referred to a document on aviation security applying to aerodromes operating less than 2730kg, with the request that this subject is put on the agenda for discussion at the next meeting of the LAASG, scheduled for Thursday 12<sup>th</sup> May. *Post-meeting note: This subject should be added to the list of 'issues' to be drawn up by the sub-group for discussion at subsequent meeting (see action item 12)*

JW mentioned that in 2001, approximately 30% of UK reportable accidents in UK FIR involving GA aircraft occurred at unlicensed aerodromes and only a small number of these had aerodrome related factors.

#### 7. DATE OF NEXT MEETING

Thursday 12<sup>th</sup> May 2005, Aviation House Gatwick. 10.30am start

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#### ACTIONS FROM MEETING: (Actions 1-7 allocated to previous meeting)

**Action Item 8:** IB to alter the notes from 23/2/05 and any related information on the website to correctly show that JH represents both BBAG and BHAB.

- Action Item 9:** JH nominated to do risk assessment on fire categories.
- Action Item 10:** CF (BMAA) and TS (BGA) to provide their 'Code of Practice' guidelines to IB for distribution.
- Action Item 11:** The sub-group should create a 'Code of Practice' document, led by JH
- Action Item 12:** A checklist of 'Issues' to be drawn up by sub-group and sent to IB for discussion at subsequent LAASG meeting.