DRAFT NOTES OF MEETING

LIGHT AVIATION AIRPORTS STUDY GROUP Aviation House, Gatwick 5 July 2005

Attending: Graham Forbes (GF) CAA PLD Chairman

Gary Beaton (GB) CAA ATS CAA ATS Maria Boyle (MB) Paul Fleming (PF) CAA ASD Mike Grierson (MG) CAA PLD Geoff Parker (GP) **CAA FOD** CAA ASD Gary Phillips (GPh) Mark Smailes (MB) CAA DAP Chris Finnigan (CF) **BMAA**

John Haffenden(JHa) AOA/BBAC

Janet Hoare (JH) BBGA/BHAB

Dorothy Pooley (DP) GAPAN

Barry Tempest (BT) PFA
John Walker (JW) AOPA

Inez Bartolo (IB) CAA ASD Secretary

Apologies: David Corbett (DC) GASCo

Ben Alcott (BA) CAA SIDD

David Beaven (DB) CAA GAD

Terry Slater (TS) BGA

1 APOLOGIES

Apologies were received from Messrs Corbett, Alcott. Slater and Beaven.

2 NOTES OF PREVIOUS MEETING

The minutes of the previous meeting were agreed without change.

3 REPORT FROM AOA MEETING (PAUL FLEMING)

PF presented an overview given to the AOA annual conference in the previous week for the benefit of those unable to attend that meeting¹. The presentation offered a resume of previous reviews to look at the small aerodromes regulatory oversight, beginning in 1996. More recently (2003/4), a low category aerodromes team (LCAT) was initiated to look at low category aerodromes and the risks involved. Concern was raised about the transparency of this work, especially the recommendation that Licensing Department could assume responsibility for oversight of a training organisation's landing/take-off facilities, as no report had been published. PF advised that the work of the internal review was superseded by LAASG, bringing us up to date with the review.

Action 21:

IB to distribute draft report of LCA Team

The LAASG were asked to concentrate on the final two slides, which included a list of anomalies of Article 101 (A101). It was noted that although public transport at unlicensed aerodromes is not generally recognised as acceptable, there are some instances where this is permitted, including A-B ad-hoc charter flights using aircraft below 2730kg. It was agreed that this subject would be discussed at a future meeting.

PF advised that the purpose of the presentation to the LAASG was to focus their minds on the issues that face the group and the need to provide justification for any change, acceptable to the CAA, to go forward into a report to the Head of AALSD. JHa concurred that A101 needs to be looked at, particularly in relation to flying training; however, many questions come out from this related to flying training – the safety standards that may result at those airfields and the likely knock on effect for AOC operators that cannot then go into these unlicensed aerodromes, but will not realistically be able to go into the likes of Gatwick and Heathrow. In addition to this, there is concern that insurance costs may be affected by any change in the regulatory oversight of some aerodromes, and it may be beneficial to delve into this subject at a future date. BT suggested an insurance

¹ Presentation will be made available on the LAASG section of the CAA website

underwriter should be invited to the next meeting to address the issues over insurance. Post meeting note: Due to the time constraints placed upon the Group, it has been decided that this suggestion is not viable at this moment in time.

General Advice:

BT: Public transport, under certain circumstances, is allowed from unlicensed airfields.

In addition, it is only powered gliders that must operate from a licensed aerodrome

(this relates to presentation by PF to AOA).

JH: Security <2730kg – this factor may force some aerodromes to become 'unlicensed'

as Industry cannot afford the additional costs of security as well. If this happens,

the middle sector of aviation may disappear with huge implications.

DP: A lot of the debate at this meeting seems to be about cost implications for AOC

operators and small airfields; As a suggestion, perhaps, consideration should be

given to a 'percentage movements' cut off rather than weight. If there are only a

small number of AOC movements then they could still fall into the 'smaller' airfields

category, qualifying under the 'small percentage of overall movements'. I

addition, perhaps length of runway could be considered.

JW: On the issue of flying training; if we expand the authorisation for a flying training

organisation (FTO) to approve the aerodrome, that is fine for a flying training

organisation that actually owns an aerodrome, but what about others that don't?

This needs to be considered.

GP: GP was mindful that the Group keep referring to 'minor public transport' but do not

really cover the subject. GP is happy to consider to subject but cannot pre-empt

any outcome. It was proposed to agenda this subject at a future meeting.

4 AERIAL WORK (previously agenda item 6)

JW's agenda item was brought forward to item 4 and was presented to the group: Article 130 of the ANO presents a definition, specifically excludes public transport from the term,

which leaves flying training and other items. If the Group propose to exclude flying training

and other flying test elements, what remains is aerial work (covering banner towing,

surveys, pipeline inspections – and similar operations where the aircraft is used as a platform to carry out a task). It was agreed that within the Air Navigation Order there is no requirement for a flight for the purpose of aerial work to use a licensed aerodrome. JW's proposal is that Article 101 should permit aircraft less than 5700kg, for the purpose in aerial work, to operate from aerodromes other than a licensed aerodrome.

Action 22:

IB speak to GAD for clarification on which aerial work applications/tasks require a condition placed upon them that they must use a licensed aerodrome.

Post meeting note: GAD confirmed that aerial work applications do not require a licensed aerodrome.

JH believes there may be quite a lot of 'large' aircraft operating in Scotland (Isla) doing surveys and fisheries, which may be on aerial work instead of an AOC. Caution should be afforded to these operators when looking at aerial work. The weight limit might be a bit arbitrary without investigation into it.

Action 23:

IB to seek the comment of GAD in relation to JH comment

Post meeting note: GAD confirmed that aerial work would, in future, be regulated under EASA Implementing rules, most likely based on the draft JAR-OPS 4. To date there has been no suggestion that a certified aerodrome would be a requirement for aerial work operations. As with JAR-OPS 1, it is the operator's responsibility to ensure facilities are suitable and applicable performance requirements can be met.

5 IMPLICATIONS OF JAR-FCL APPROACH

This agenda item was introduced by GF, who approached colleagues within PLD to see the reaction of this proposal. There are two issues to be considered: (1) flying training organisations – approximately 150; and (2) registered facilities - approximately 550. GF made initial approach to the inspectors and flight examiners for comment. PLD conduct regular oversight of approved organisations but do not do so with registered facilities. A decision would be needed as to how it could be established whether registered facilities had satisfactory take-off/landing facilities. JHa suggested that Article 133 would be suitable way of auditing the registered facilities, providing a simple checklist for the FIE to wander round the airfield and report on the condition of the airfield. MG advised the Group

that JAR-FCL addressed aerodromes from a purely 'performance' criteria, not from safety

criteria. It ensures aircraft are of specific performance to operate from aerodromes. They

require a minimum of A-G. MG stated that, from a flight crew licensing aspect, the reason

flying training activities must use a licensed aerodrome is to effect a level of protection to

the solo student. CF raises the point that solo students mostly get into trouble at places

other than the aerodrome.

One suggestion put forward by JW was that if we went down the route of approving

organisations/registered facilities, the applicant would fill out a questionnaire nominating

the base from which they would operate, and would state who was responsible for that

base, undertaking to abide by any code of practice. MG added that this would not work if

the aerodrome were unlicensed as there is no need for 'an operator'. JW voiced the

concern that AOPA feel self-regulation is not the way forward.

GF asked whether a code of practice could be developed to cover the need to 'keep check'

of approved organisations or registered facilities. DP raised concerns over flying training

instructions under JAR-FCL, believing that the system in place when establishing whether

a fledgling instructor is capable of taking on the responsibility of an upgrade from a

restricted instructor to a fully qualified instructor is inadequate. MG agreed with DP's

comment.

It was noted that JAR-FCL was not based on Annex 14 or other annexes, as it did not

cover public transport. CF raised concerns that the Group continue to talk about

'regulated' oversight when discussing 'registered' and the importance of remembering that

when somebody registers their facility they are signing a statement that it complies with a

definition, and that the requirements as laid down have been met, with the onus on the

operator if anything goes wrong. MG concurred with this sentiment, believing insurance

companies would insist on compliance with requirements.

GF asked the Group whether they considered it would be reasonable to ask

approved/registered facilities to have some level of rescue or fire fighting equipment,

assuming they are no longer required to operate from a licensed aerodrome, over and

above what is required in JAR-FCL? CF believes that evidence suggests that RFF has not

saved significant numbers of lives, although in some countries there is a requirement for

airfields to display important information on weatherproof boards such as telephone

numbers and locations for hospitals, doctors etc.

It was agreed that PLD would progress the issues raised under this agenda item and report back at the next meeting. As an additional point, it was highlighted that although there may be savings in removing the requirement for a licensed aerodrome, any registered facilities might have to incur charges from the CAA because the administrative costs of ensuring that the take-off/landing facilities are acceptable. This issue must be remembered when considering the approved and registered facilities charges; it would not be appropriate for the 'approved' facilities to pick up the costs of 'registered' facilities.

Action 24:

GF to discuss within PLD

6. IMPLICATIONS OF THE RAA PROPOSALS

General discussion focussed on the Recreational Aviation Activities Manual (CAP755) distributed by DB to members. CF considered the document to be focussed on a commercial activity that provides people with an opportunity to experience aviation, rather than 'courses' to learn to fly. MG felt that recreational aviation may need more regulation than teaching people how to fly and there is concern regarding the proliferation of this sort of activity. CF advised that this document was as a result of the Authority's concern over liability for this activity, adding that the intention of the BMAA is to produce a Code of Practice for microlight aviation, which would capture the whole area of flying training and recreational activity because the same instructors offering recreational aviation are offering flying training.

BT informed the Group that aerodromes were not mentioned in the RAA Manual. On the discussion of microlights, GF sought confirmation from the internal members of the Group that there would be a reduction in anomalies if the CAA were to change A101 to allow flying training from unlicensed aerodromes – this was confirmed as correct. However, CF said that if there was a requirement to register on a recurring basis, it could be perceived as an imposition of a regulation that isn't in place at the moment. GF believes that although it is important to get rid of the anomalies, we should not place any more burden on those that do not have to comply.

JH believes the document would be more time-consuming to apply than the code of practice she produced for the LAASG; this was met with agreement. BT believes the

document is set much lower than an ops manual, but higher than nothing at all, so is satisfactory. The document has been approved by the CAA Executive Committee and has

subsequently been published.

RFFS: JH revisited the subject of RFF, stating she is not against fire cover, just unnecessary fire cover. GP advised JH that it is not the size of the aircraft that dictates how many lives can be saved, but is based on an international standard, calculated on a mathematical equation in relation to the amount of fuel on board an aircraft. GP also asked the Group whether they had any figures available, from purely flying training aerodromes, as to the cost of providing fire cover only, excluding the additional tasks taken on by fire crew (grass cutting, other operational duties etc). JW believes it will be difficult to cost as fire crew often receive other forms of 'payment', perhaps subsidised flying, or a flying lesson. In addition, JW stated that nothing will change, regardless of whether there is a CAA requirement to retain RFF, because there are other H&S issues (including

insurance) that will mean some RFF cover remains. Both JW and JH consider the cost of

complying with CAP 699 is more than the hardware.

Action 25:

JH to seek comment from 'special' category aerodromes (following receipt of list from GP)

7 ANY OTHER BUSINESS

GB commented that the Group have discussed some very valid issues; however, we need to concentrate our efforts on A101 and perhaps consider 'starting with a clean sheet' and putting forward proposals that highlight those activities that 'should' use a licensed aerodrome. List those activities, which will then identify anomalies. Where it is considered there are alternatives arrangements more appropriate for those anomalies, put forward proposals

Action 26:

LAASG to write down list of activities that must use a licensed aerodrome

GPh agreed to supply a list of 'special' category licensed aerodromes to enable JH to approach them with questions regarding fire costs.

Action Item 27:

GPh to sent list to JH

BT: Would like confirmation that the recent Chairman's letter, which states there would be a review of small aerodromes within the next 12 months or so, is referring to the LAASG. GF confirmed this was the case.

7 DATE OF NEXT MEETING

Tuesday 9th August 2005

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ACTIONS ARISING:

(Action items 1-20 allocated to previous meetings)

Action Item 21: IB to distribute final report of Low Category Aerodromes

Team (LCAT) to external members of LAASG

Action Item 22: IB to request clarification from GAD on which aerial work

applications/tasks that must use a licensed aerodrome

Action Item 23: IB to seek the comment of GAD regarding JH comment

that some operators in Scotland, using 'large' aircraft, are

conducted under aerial work rather than an AOC.

Action Item 24: GF to hold internal discussions with PLD members

regarding the possibility of accepting flying training as

an 'approved' activity under JAR-FCL.

Action Item 25: LAASG members to provide list of activities that they

consider must use a licensed aerodrome (send to IB)

Action Item 26: JH to seek comment from 'special' aerodromes on RFFS

costing (following receipt of addresses from GP)

Action Item 27:	GP to provide JH with list of 'special' aerodromes and
	addresses