

**STATUS REPORT ON THE PROGRESS OF THE
RECOMMENDATIONS ARISING FROM THE
STRATEGIC AND REGULATORY REVIEWS OF
GENERAL AVIATION**

16th October 2008

1. INTRODUCTION

In June 2005 the Chairman of the Civil Aviation Authority (CAA), Sir Roy McNulty, invited the UK General Aviation (GA) community and representatives of UK Government to join the CAA in carrying out two connected reviews of GA, one Strategic and the other Regulatory.

Reports of the deliberations of the two review groups were published in July 2006, and contained a variety of recommendations that were subsequently reviewed and endorsed by the CAA Board.

Following the publication of the reviews, and in response to one of the recommendations calling for more effective dialogue between GA, CAA and Government, the CAA established the General Aviation Strategic Forum (GASF) with key representatives of the GA sector who had attended the review meetings, and representatives of the CAA and Department for Transport (DfT). The GASF then became responsible for progressing the recommendations of the Strategic Review (SR). Steps were also taken to establish 'GA focal points' within the CAA and Government.

The GASF has met five times since July 2006 with the objective of steering the implementation of the recommendations of the SR, and providing a focal point and coordinated voice for the GA community with Government and the CAA. It intends to consider emerging issues of a strategic nature as they arise.

In March 2008 the GASF and the CAA concluded independently that it was an appropriate time to take stock of progress following the Strategic and Regulatory Reviews of General Aviation by the CAA and agreed a joint report would be appropriate. This joint report contains the views of the CAA, Government (through the DfT) and the GA 'Industry'. It also attempts to place the recommendations of the Reviews into a wider context for the future of GA in the UK whilst considering progress against the recommendations and how to continue building on that progress.

2. BACKGROUND

2.1 *Scope of the GA sector*

The GA sector is very wide in its scope. It covers everything from the simplest and lightest air sports aircraft, such as hang gliders, through to large jets operated commercially but non-scheduled. Using the ICAO definition as a guide, the SR adopted a pragmatic scope for GA as "a civil aircraft operation other than commercial air transport flight operating to a schedule". Military aircraft operations are thereby excluded from the scope, though there are borderline issues of aircraft deployed in military flying but which are civil registered.

2.2 *Drivers in the GA sector*

The factors that drive activity, 'behaviour' (in the widest sense), and success or failure in the GA sector vary according to the part of the sector being considered. However, common to all are the following drivers:

- Public safety
- Economic demand for services and competition
- Economics of operation, including volume and efficiency of activities, and taxation

- Degree, appropriateness / proportionality and costs of safety regulation
- Availability and costs of infrastructure access – airports/airfields and airspace in particular
- A fair and level playing field
- Labour supply to support GA – whether volunteers in the lighter end of GA or qualified employees in the medium and heavier end
- Environmental issues and regulatory compliance

Many of these factors are in the hands of Government or the Regulator(s), though some are more appropriate to the GA community provided it is given equitable access to these authorities.

2.3 *Factors affecting GA*

In the minds of the wider public, most of civil aviation is related to civil air transport – airlines, airports, business journeys, holiday destinations, safety, environmental impacts, budget airlines, costs, fuel etc.; that is what features in the daily media. Understandably, it is also the predominant focus of the CAA, DfT and UK Government.

GA has a lower profile in the public mind, because it does not generally receive the attention of the media, except when things go wrong (safety aspects), or when, for example, a local airfield planning situation arises. However, for the GA community, whether at the recreational and air sports end of the spectrum or at the business aviation end, it is very often the primary focus of the lives of the players and participants.

Those involved in GA feel there is a need for it to be taken into account fairly, not just by the public but by the Regulators, whether in the UK, Europe or on a global scale at ICAO, and Government, which includes in this sense not just the UK Government but also the European Council, Commission and Parliament.

UK GA is a significant economic activity, as outlined in the SR (reference: T. Lober, c. £1.4bn p.a./11,000 employees); many industry insiders think the economic contribution is significantly greater than this. The hope expressed by the ‘industry’ representatives in the SR was that the importance of GA should be elevated to a level in the policy considerations of Government and the CAA that would reflect the importance of GA in the business and social structure of the UK.

GA provides a rich seam of recruits into Commercial Air Transport (CAT), in particular pilots and engineers. This represents an important element of vertical integration in the civil aviation industry, even if few amongst the major CAT operators acknowledge this openly. The expansion of CAT is also one of the difficulties for GA whose access to certain controlled airspace and small airports, and the availability to it of uncontrolled airspace, is being progressively constrained by the increased demands of CAT.

GA, and particularly the air sports and light aircraft end of the sector, provides an important recreational activity for many people (estimated at c.90,000 directly in the UK), and a further significant number with an indirect interest through participation in trial lessons, air shows and events etc. This part of the sector is characterised by its volunteer/club organised structure. Any major adverse influences, regulatory, economic or safety aspects, on these activities can have a damaging effect on participation and activity levels.

The implementation of the recommendations of the SR, in particular, is dependant largely upon the CAA, DfT and other Government departments taking the initiative with a willingness to succeed and creating the appropriate climate for positive change. The GA community is willing to play its part in the initiatives where it is in a position to do so.

3. THE KEY STRATEGIC ISSUES FOR GENERAL AVIATION IN THE UK

3.1 In order for GA in the UK to survive and grow, the following primary factors and external influences are considered most important:

- Operation with public safety
- Regulatory environment, framework and drivers
- The role and influence of the European Community (EC), the European Aviation Safety Agency (EASA) and other bodies and their activities
- Infrastructure retention, development and accessibility
- Access to controlled airspace; availability of uncontrolled airspace
- Taxation environment and policies
- Innovation and new technology
- Labour supply
- Environmental
- Relationship between GA community and Government/CAA

3.2 *Safety*

Clearly, a safe operation is key to success in any GA activity. However, whilst not being in any way complacent, it needs to be recognised that in aviation, and in particular in some areas of GA that are at the sporting and adventurous end of the spectrum, increased risk is sometimes present. Inevitably, some accidents will happen and some will prove to be fatal. This must not lead to a position in which the authorities pursue an unrealistic goal of zero risk, because to do so would result in the vast majority of participants not benefiting from the activity.

Therefore a balance needs to be achieved. Generally the approach of the CAA is in accordance with this principle, seeking to educate and inform about hazards and risk and how to manage that risk, whilst not prohibiting the GA activity although accepting it might present a higher level of risk when compared to UK CAT.

The GASF and GACC should continue to develop their initiatives to target a reduction in the accident rate by taking advice from all stakeholders through the various mechanisms and forums already established. A fair and level playing field in the application of safety orientated initiatives is essential.

3.3 *Regulatory environment, framework and drivers*

The GA community accepts, in general, the need for appropriate and proportionate safety regulation. However, collectively the community has extensive practical experience of safety aspects in all or most areas of operation. Whilst the independence of the Regulator is essential in determining what and how activities should be regulated, it is contended that a close working partnership with industry to arrive at an acceptable level of regulation, where such regulation is deemed necessary, benefits all parties.

This partnership approach has been more evident in recent years following initiatives with the CAA, with the formation of various working groups and indeed due to the 2005-06 Regulatory Review itself.

3.4 *The role and influence of the EC*

The UK GA community has been represented in the working groups and other forums of the EU through three main European bodies to which it is aligned – International Aircraft Owners and Pilots Association (IAOPA), Europe Air Sports (EAS) and the European Council of General Aviation Support (ECOGAS)

Whilst the work of the representatives, acting as experts, has resulted in some positive influence on emerging EU regulation and implementing rules, not all of the desired outcomes of UK GA have survived the needs of EU standardisation (as distinct from harmonisation).

Therefore, to protect the interests of the UK GA community, it is necessary for the UK Government through the DfT, and with the support of the CAA, to exercise its influence in the EC to try and ensure that the final outcome is not disadvantageous to the UK. There have been some good examples of the successful intervention and influence by the UK Government in the debates in Brussels one of which has been the acknowledgement of the need for a suitable replacement for the UK IMC rating. For the future, there is an urgent need to continue the structured approach by which UK GA can discuss and determine key objectives and strategy with the representatives of the UK Government in the EC process. The DfT's long-standing informal forum for EASA matters is a useful one through which such a structured approach should be continued.

In January 2008 the European Commission published a 'Communication' entitled 'An Agenda for Sustainable Future in General and Business Aviation' – COM (2007) 869. This was an important and supportive document in terms of official EU policy towards GA, and a baseline for future action to enhance this area of the Community and within the totality of the aviation community within the EU.

The EC has directed EASA to develop implementing rules for GA that are proportionate to the complexity of aircraft and operations. Whilst EASA is clearly pursuing this directive, the development of the proposed implementing rules will of necessity involve the views of other interested parties such that published Notice of Proposed Amendment (NPA) will require careful study to assess whether the outcomes are indeed proportionate.

As stated in the SR, it is incumbent on the CAA, Government and the GA community, working together, to seek to ensure that the new regulations are beneficial and proportionate to risk.

3.5 *Infrastructure retention, development and access – airports and airfields*

These aspects are covered in paragraphs 13 and 14 of the Executive Summary of the SR, and can be summarised as:

- (a) Some airports, which traditionally or previously provided GA facilities, have become or are becoming more CAT orientated. This results in GA being squeezed out on economic grounds (often portrayed as operational reasons) due to the pricing policies of the private sector owners. Such airfields are often, in effect, local monopolies, and as such the GA community believes

that in the public interest the requirement to accept suitable GA traffic on reasonable terms should be taken into account.

- (b) The operation of the planning regime can frequently militate against the retention of an airfield. Local planning decisions can be to the detriment of maintaining a viable national network of airfields for GA use. The analogy would be if the national rail network only had stations at the major cities. GA depends upon a viable network of airfields, and comparison with several European countries, such as France and Germany, does not show the UK in a favourable light in this regard.

These issues are regarded by the GA community as one of the most important strategic issues for which the Government, through the DfT, supported by the CAA (in so far as it has a role for the maintenance of an airfield infrastructure), is strongly encouraged to address as a priority as more and more GA airfields each year are turned into housing estates or industrial parks.

3.6 *Access to airspace*

These aspects are covered in paragraph 12 of the Executive Summary of the SR, and can be summarised as:

- (a) Controlled airspace has increased over recent decades to accommodate the growth of CAT, which carries far greater economic influence than GA.
- (b) Many types of GA operation require access to controlled airspace for the same reasons of protection and air navigation service provision as that required by CAT.
- (c) The reduction in uncontrolled airspace adversely affects those GA operations which rely primarily on flying in uncontrolled airspace, such as air sports activities and light aircraft flying for leisure or business.

As stated in the SR, all stakeholders should strive for an outcome that allows all users to enjoy the maximum use of airspace consistent with safe operation.

3.7 *Taxation environment*

The UK flight training industry believes that it is at a competitive disadvantage when compared with flight training providers in other countries with different taxation regimes in respect of fuel and VAT. This encourages UK based trainees to travel overseas to conduct their training.

The GA community would expect that those in Government who develop policy proposals for taxation should have a good understanding of the impact on GA and draw on the expertise within GA when developing policy proposals.

3.8 *Innovation and new technology*

The UK was once a leader of innovation in aviation. It still is in some respects, particularly the CAT sector, with many companies supplying the needs of CAT manufacturing and services. The same can no longer be said of the GA sector, which has suffered severe decline over many years as more competitive and less restrained manufacturing environments have emerged elsewhere in Europe.

The UK, with the rest of Europe, could become part of the global move to develop new aircraft types but this will require some fundamental changes in approach, which can only be developed with a focused group of key and expert people studying the various issues that need addressing.

3.9 *Labour supply*

There are direct and indirect labour supply issues that concern GA. Firstly the supply of pilots. The traditional start of the food chain for many pilots entering UK airlines is the flying clubs. If the source of new, largely self-funded, private pilot licence holders dwindles then the airlines and the business sector of GA will suffer shortages of pilots who are part-trained for the airline transport pilots licences.

Secondly, there continues to be a shortage in the supply of aircraft engineers trained to maintain light aircraft. This is due mainly to a lack of a suitable career path for trainee engineers and the draw of airlines and overseas markets. The situation may have been exacerbated by the introduction of European licensing regulations that have complicated the situation slightly and it is believed that some existing engineers may have elected not to continue their trade as a result.

3.10 *Environmental issues*

In line with CAT, GA is subject to increasing focus from environmental concerns around noise and emissions. Both these factors can be addressed progressively with the development of new and cleaner technologies for engines in aeroplanes. GA activities should be compared with other forms of transport, essential to western society, when considering the impact of noise and emissions.

3.11 *Relationship between GA and Government*

The CAA and DfT are of the view that the GA community needs to represent its interests and concerns to the authorities in a more coordinated and organised manner. Equally, Government and the CAA should always ensure that GA is fully consulted on developments, changes and policy that affect this sector of aviation.

As a result of history, the UK GA community has many representative bodies, each looking after a particular sector of interest. Broadly they can be grouped by four leading bodies – the Aircraft Owners and Pilots Association (AOPA), the Royal Aero Club of the UK (RAeC) consisting of the individual air sports association members, with generally a maximum aircraft MTOM of 2 tonnes, the British Business and General Aviation Association (BBGA) representing the business support interests of GA and the Association of Licensed Aircraft Engineers (ALAE). The Guild of Air Pilots and Navigators (GAPAN) might be considered another leading player.

There are a few other overarching bodies such as the General Aviation Safety Council (GASCo) and General Aviation Awareness Council (GAAC) which deal with the specific topics of safety and airfield protection/planning respectively.

Whilst the cry to GA from Government and the CAA has often been ‘speak with one voice’, the reality is that this is not possible because, firstly, the spectrum of GA activities is very wide and diverse, and secondly, on any particular issue, the different sectors of GA may well have differing or even opposing views. The third reason is historical; the associations have a proud and independent history which they believe has stood the test of time and they would need some convincing to

ignore the past and amalgamate their organisations merely to meet the needs of the authorities for efficient consultation.

However, in recent times there has been a genuine effort on the part of these organisations to co-ordinate their positions. The limitations to this are usually resource based; most of the people conducting the representation are volunteers whose time is limited by their other, paid, roles in life.

3.12 *Data on GA*

In order to understand the extent and activities of GA it is essential to have available objective, robust and up-to-date data. A variety of data sets exist within the UK GA community. Some is collected and published by the CAA, for example, accident data for some GA activities, but not all. Other data is collected and published by some of the various GA associations.

In 2007, the European Commission took an initiative following a forum in March that year to establish a working group to study and make recommendations for data sets on GA in Europe. The UK took a leading role in this, with the UK DfT chairing the working group and the UK CAA providing support through a sub-group. Several UK based 'industry' representatives were involved. The output in October 2007 was a report to the Commission with recommendations for creating data sets. The initiative now rests with the Commission but if it does not come to fruition then the recommendation will be extant and may need to be addressed in a different way.

4. UPDATE ON THE RECOMMENDATIONS FROM THE STRATEGIC AND REGULATORY REVIEWS

Appendices A and B to this report give a detailed update on the specific recommendations stemming from the Strategic and Regulatory reviews. As can be seen from the appendices, good progress has been made with most of the recommendations dealt with and closed. 8 out of the total of 33 recommendations have not yet been completed due to either lack of resources, the complexity of the topic or the need to consider the emerging EASA implementing rules. It is intended that these outstanding recommendations will continue to be addressed by either the GASF or the GACC as appropriate.

5. CONCLUSIONS AND WAY FORWARD

The SR was a major milestone in the relationship between the GA community and the CAA. It came at about the right time in the light of regulatory developments in Europe, and significant factors and influences emerging in the UK

During the last two years, the roll out of the SR activity into the GASF has only been partially successful. Whilst some recommendations have been addressed sincerely and methodically, the remainder have not yet seen the same progress; in summary, 6 of the 14 recommendations remain open.

The GA participants have been less proactive through the GASF than had been hoped. In part this is the result of several of the individuals having been heavily preoccupied in dealing with future EU aviation legislation.

In order to make further material progress, the situation needs to be resolved. The following proposals are therefore offered as a constructive way forward.

1. GASF to be elevated to a level of involvement from both the GA community and Government (DfT, CAA and others as needed – e.g. Treasury) where those officials proposing or making policy are directly represented or involved. i.e. the forum needs to be as close as possible to the decision makers.
2. Agendas for GASF meetings to be sharpened and focused, and meetings to concentrate on genuine top level strategic issues;
3. Position papers should be commissioned with designated authors, and drafts circulated well in advance of meetings
4. GA members of the GASF to consult with main GA stakeholder groups on the composition of membership of the GASF so as to ensure the most appropriately qualified and available personnel are selected
5. GASF to be the GA focal point for high level co-ordination with UK Government (mainly through DfT) on UK positions on emerging EU regulation and Implementing Rules, with possible links to the DfT forums on Airspace and EASA matters

In contrast, the Regulatory review recommendations were much easier and less contentious to implement than those of the Strategic review. Consequently all but 2 of the 19 recommendations have been closed. The two outstanding recommendations are largely dependant upon future EASA policy.

**APPENDIX A
STRATEGIC REVIEW RECOMMENDATIONS**

Recommendation 1	Status: Open
<p>It is recommended that Government and CAA take note of the overall economic and social value of GA and consider whether there are areas where national policy guidelines or objectives may be needed in relation to GA and its future, including:</p> <ul style="list-style-type: none"> i) Government to consider making a policy statement on the value of maintaining a viable network of GA airfields, to be considered by those involved in planning decisions in the future ii) Government to revise the CAA’s statutory objectives at section 4 of the Civil Aviation Act at the next opportunity to remove any suggestion of bias toward commercial air transport over GA 	
<p>Context: The General Aviation sector had felt that its economic contribution to the UK economy and its value to UK society was not fully recognised by Government and its Regulator and this recommendation was made to address this.</p>	
<p>Status Report: The Parliamentary Under Secretary of State for International Networks and the Environment has issued a policy statement confirming that the government recognises the value of maintaining a viable network of airfields for use by GA aircraft. In particular it encourages local planning authorities to consider the impact that neighbouring developments may have on the future viability of an airfield and how that may affect the national network as a whole. This is reflected in Government Planning Policy Guidance documents PPG 13, PPS 22 and PPG 24.</p> <p>Revision of the CAA’s statutory duties will require an amendment of primary legislation and is reliant on securing a slot in the next available legislative session. It has been suggested that this could be achieved by combining with any changes arising from the Pilling report.</p> <p>This recommendation is to remain open until the change to the CAA Act is completed.</p>	
<p>Next Steps:</p> <p>The CAA, DfT and GA Industry should work together through the GASF to ensure that the changes to the CAA Act are carried out as required.</p>	
<p>Owner: GASF</p>	

Recommendation 2	Status: Closed
<p>There is a need for a more effective dialogue between GA and CAA and Government – with all parties needing to work to improve this. Steps to be taken include:</p> <ul style="list-style-type: none"> i) establishing people as “GA focal points” within CAA and Government ii) setting up a quarterly forum – perhaps by elevating the CAA’s current General Aviation Consultative Committee to a more strategic body and setting the agenda at the right level 	
<p>Context: Linked to Recommendation 1 above the GA Sector felt its voice was not heard and sought to improve its lines of communication with Government and its Regulator to re-establish trust and to ensure the Sector was not “marginalised”.</p>	

Status Report:

Focal points within the CAA and DfT have been identified. All parties agree it is essential that these focal points are reviewed periodically to ensure continuity, especially in the event of restructuring or personnel changes.

Rather than elevate the GACC to a strategic level as suggested it was agreed that a separate strategic forum should be created to deal specifically with high-level strategic issues. The Terms of Reference for the forum were agreed and the first meeting held in October 2006. The GASF continues to provide a basis for high-level interaction between the CAA, DfT and GA Industry.

Next Steps: None

Owner: GASF

Recommendation 3**Status: Closed**

GA needs to co-ordinate and present itself better in order to put its case more effectively. Its ability to lobby would be improved if it could coalesce around a smaller number of groups for interface with Government and regulator. The structure of European GA (where Europe Air Sports, the International Aircraft Owners and Pilots Association and the European Council of General Aviation Support are the three active representative bodies) may offer a model that could sharpen the focus and enhance the effectiveness of GA's contribution

Context: The Government and the CAA had felt for some time that the GA Sector would be better represented if it could speak with "one voice" on key strategic issues and not present diverse and competing views.

Status Report:

The GA industry has responded positively to calls by the CAA and Government to 'speak with one voice' however it is recognised that the disparate nature of the industry and the unique requirements and interests that must be represented make this task unlikely to become a reality. Furthermore, the style of consultation by EASA encourages responses by large volume and does not provide a mechanism for one organisation to comment on behalf of another.

It is agreed that the representatives of the GA Industry should work together to present a co-ordinated view through recognised bodies on topics of interest to GA.

Next Steps: The GA industry to continue efforts to present a co-ordinated view to the government and regulator.

Owner: GASF

Recommendation 4**Status: Closed**

CAA, Government and GA to work better together to influence legislative changes emanating from the EU with the aim of maintaining a fair balance for all aviation interests. A current example is a need to ensure that the requirements for private pilots to gain an instrument rating are relevant and proportionate.

Context: The need for a better dialogue between the CAA and the GA industry to

understand and address the EASA rulemaking programme as it emerged was identified.

Status Report:

Since this recommendation was made, GA industry involvement in the EASA rulemaking process has increased substantially. CAA European Focal Points are in regular contact with the industry, in particular at GACC and GASF meetings where the industry, DfT and CAA discuss pertinent European issues by way of a standing agenda items. All parties have expressed agreement that this arrangement is productive and should be continued.

Next Steps: Continue working together to provide balanced comments on EASA proposals as they are developed.

Owner: GASF and GACC

Recommendation 5

Status: Open

GA-related policy at all levels to be developed in accordance with the Better Regulation Task Force's five principles of good regulation

Context: GA bodies wished to be reassured that all regulatory and policy change that would impact on the Sector was developed transparently and in accordance with the BRTF principles.

Status Report:

The Government and CAA currently adhere to the Principles of Better Regulation as defined by the Better Regulation Task Force. The CAA have produced a document detailing how it will implement the principles and this document has been presented to the CAA Management Committee and endorsed. Following requests from the GA industry for further commitment to the principles, the DfT have agreed to consider adding a statement to the DfT sponsorship document.

Next Steps: To consider a change to the DfT sponsorship document

Owner: DfT

Recommendation 6

Status: Open

Government to consider whether the current VAT treatment applied to flight training places UK flying schools at a competitive disadvantage to those based in other countries and imposes too great a burden on the self-sponsored trainee

Context: The GA Sector felt that the VAT regime in the UK did not provide a "level playing field" for flying training when compared with those of other EU States and Third Countries, and was contributing to UK pilots training outside the UK where they did not gain the same experience of North-European weather as pilots trained within the UK and were thus less able to deal with such weather.

Status Report:

The UK has implemented the mandatory exemptions for the supply of education laid down in the Principal VAT Directive but they do not make allowance for profit-making organisations such as flying schools. The exemptions are mainly applied to supplies made by bodies governed by public law. In some cases there is discretion to extend the

exemptions but generally these will not apply to commercial profit-making bodies. Accordingly, the HM treasury believe that flying schools are ineligible for an exemption.

The Department for Transport (DfT) officials have arranged a series of engagements with HM Treasury during the autumn of 2008 to discuss issues such as VAT, fuel duty and other matters. The DfT has requested evidence to show how other EU member states interpret the VAT Directives differently that would be of assistance to Department officials in their forthcoming discussions. Initial research by the GA industry indicates that professional flight training is exempt from VAT in Germany; Netherlands, France; Spain and Norway.

Next Steps: Continue liaising with HM Treasury

Owner: GASF

Recommendation 7

Status: Closed

Skilled labour for the UK aviation sector (pilots and, particularly, engineers) may be in shorter supply in the future as global demand increases and traditional sources prove less fruitful – this should be factored into future planning by industry, Government and the CAA.

Context: Concern was expressed by the GA Industry Bodies and Government that a perceived future shortage of skills in an increasingly global aviation marketplace would adversely impact on the UK.

Status Report: It has been decided that this recommendation is closely linked to Recommendation 12 and that any action that can be taken to address it will included in those action arising from Recommendation 12.

Next Steps: Nil

Owner: N/a

Recommendation 8

Status: Closed

Responses to the increased public sensitivity to environmental issues to include:

- i) GA redoubling efforts to be considerate neighbours**
- ii) CAA issuing all new pilots with guidance about noise**
- iii) A joint CAA-industry working group to be set up to review whether there are regulatory barriers preventing technological solutions to the environmental impacts of GA, such as noise and emissions**

Context: It had become apparent that the environmental impact of aviation was becoming an increasingly prominent issue in public consciousness and that GA needed to respond to this.

Status Report:

The GA Awareness Council (GAAC) devised a Code of Practice for aircraft and airfield owners which has been distributed widely throughout the GA Industry in a leaflet titled 'Considerate Flying'. The leaflet also gives advice on the practical steps that can be taken to

reduce the nuisance to people on the ground.

Furthermore the CAA have produced a 'Private Pilot Information Guide' which is distributed to licence holders. The guide repeats the advice of the GAAC as well as giving specific guidance on the reduction of noise.

With regard to regulatory barriers preventing the development of technological solutions, a joint CAA/industry working group was established in February 2007 but it quickly became apparent that the transfer of responsibility for airworthiness to EASA had removed the previously identified barriers. Furthermore, the Royal Aeronautical Society is engaged in a number of initiatives aimed at regenerating the design and development and production of light aircraft in the UK.

Next Steps: Monitor the ongoing situation and amend or publish new advice where appropriate.

Owner: GASF

Recommendation 9

Status: Closed

Notwithstanding the development of any national statement on the value of a network of GA airfields, it is recommended that the GA community develop balanced and informative documentation to describe the particular facets of GA operations, for use in planning and safeguarding decisions. Where an issue has specific safety aspects it may be appropriate for the CAA to publish material

Context: With increasing pressure on land for housing development the threat to established and new airfields was seen as increasing. Local planning authorities were not always aware of the needs of GA and no national planning policy existed to guide them.

Status Report:

The GA Awareness Council is actively engaged in producing informative documentation for use by various organisations and has made this information available through a number of channels including a dedicated website. Furthermore, the CAA liaises closely with the planning authorities and is regularly invited to comment on aviation specific matters with specific guidance documents being developed for topics such as wind farms and aerodrome safeguarding. The CAA also notifies planning authorities of aviation specific issues by use of Planning Briefing Notes'.

Next Steps: Continue to provide explanatory information and advice to planning authorities as the need arises.

Owner: GAAC, and CAA where relevant.

Recommendation 10

Status: Closed

There is a need for increased awareness of GA by air traffic controllers and continued GA pilot education and awareness in relation to the risks of infringing controlled airspace – GA and all air navigation service providers should work together to achieve this

Context: Concern over the trend of increase in airspace infringements and the view of many GA pilots that Air Traffic Service Providers were not always understanding of and sympathetic to their requirements.

Status Report:

As part of a general effort to tackle the major safety risks in UK airspace, the Airspace and Safety Initiative Communication and Education Programme (ACEP) has been pro-actively raising awareness amongst pilots of the risks associated with airspace infringements. All parties are satisfied that the Programme has made significant progress and that it would be appropriate to continue to support the initiative.

Next Steps: Continue support for the Airspace and Safety Initiative.

Owner: All

Recommendation 11**Status: Open**

Government to consider setting up a committee to examine the GA-specific elements of aviation security requirements

Context: The GA sector was concerned that the aviation security measures introduced by Government would be applied disproportionately to GA operators and pilots and that they had no means of engaging with the necessary Agencies to make their needs and views known.

Status Report:

Attempts by the GA industry to maintain a direct dialogue with existing aviation security committees have not resulted in meaningful discussion. Despite a claim by Transec (Transport Security and Contingencies Team) that the present 33-strong membership allows for "all the different sectors of industry and government to be represented", the structure proposed as a 'reform' means that only major airports and airlines will have representation. Furthermore, the ACPO/NCPP General Aviation Excellence Group, which has previously provided interface with the various authorities and agencies involved in GA security assurance, has been wound-up.

The GA industry remains concerned that it lacks the representation necessary for its interests to be protected so urgent action is required.

Next Steps: Continue lobbying for GA representation at aviation security related groups.

Owner: BBGA

Recommendation 12**Status: Open**

Government to re-visit the 2003 Report of the Inter-Departmental Working Group on the Training of Aircraft Maintenance Engineers in the light of the findings of this Review and consider possible further action

Context: A perception of a future shortage of skilled labour for the UK aviation sector, and in particular engineers.

Status Report:

Work on this recommendation has been combined with that of recommendation 7 of the strategic review to consider the shortage of pilots as well as engineers. Whilst some progress has been made, the recommendation remains open pending the completion of the Government's review. Progress on this, together with any follow up action, remains

dependant on the availability of Government resources.

Next Steps: Continue to analyse and progress the position including the 2003 report and take action where possible.

Owner: DfT & GASF

Recommendation 13

Status: Closed

CAA to publicise to training course providers that academic courses at the right level can provide exemptions to Part-66 examinations towards Aircraft Maintenance Engineer Training

Context: It was felt that a mechanism that would recognise relevant academic courses as valid towards the issue of a professional aircraft engineering licence, should be set up and promoted widely in the educational sector.

Status Report:

The CAA made attempts to encourage organisations that approve or recognise training courses to apply for recognition that these courses provide exemptions to the Part 66 examinations. Initial reaction at a CAA-led working group was positive but unfortunately the response from the relevant organisations has subsequently been poor.

The changes to EASA Part M for small non-commercial aircraft may provide some alleviation but it was agreed that the CAA has done as much as it can and the onus is now on the industry.

Next Steps: None

Owner: n/a

Recommendation 14

Status: Open

CAA to set up a working group, with GA representation, to look at options for improving the data that is available in relation to GA activity

Context: Data on GA activity is not generally recorded, beyond the incidence of fatal accident occurrence. Lack of utilisation data makes it difficult to put accident data into context when considering safety improvement initiatives.

Status Report:

It has been recognised that there is a lack of data pertaining specifically to GA-related activities across Europe as a whole and it was initially agreed that it made sense to tackle this problem in harmony with an existing European-wide initiative led by the EU General Aviation Safety Team, however, this initiative appears to have stalled.

In the event that a Europe-wide review cannot take place the CAA should progress the task independently using the agreed common standard for the collection of data so as to be prepared to integrate with Europe at a later stage.

Next Steps: Establish whether the European-wide initiative is likely to be progressed and if not, establish a working group to tackle the problem on a national level.

Owner: CAA

**APPENDIX B
REGULATORY REVIEW RECOMMENDATIONS**

Recommendation 1	Status: Closed
The Regulatory Review Group recommends that the Board takes note of the disadvantage to UK GA compared with other regulatory models that do not seek to recover the total GA regulatory cost from the Industry.	
Context: The UK is almost alone in Europe in seeking full cost recovery (including Return on Capital Employed) from the aviation Industry. This places an additional cost burden on the GA aviation Industry compared with Europe and affects the competitiveness of certain sectors within GA in the UK.	
Status Report: This recommendation was brought to the attention of the CAA Board in November 2006.	
Next Steps: This matter should be the subject of continual review by the CAA, Government and Industry.	
Owner: GASF	

Recommendation 2	Status: Closed
The Regulatory Review Group recommends that, when the output from the EASA Working Groups MDM.032 and M.017 is mature, the General Aviation Consultative Committee (GACC) assess the effects of any likely changes to Regulation (EC) 1592/2002 as they affect GA aircraft and activity.	
Context: EASA Working Group MDM.032 is debating the issues associated with GA regulation (and M.017 will start shortly).	
Status Report: A standing agenda item at the General Aviation Consultative Committee has been introduced to provide a forum for the CAA, Government and Industry to discuss the output from MDM.032 / M.017 and other European matters. This arrangement has proven to be a productive platform for discussion and it is agreed that this should continue for the foreseeable future.	
Next Steps: Now that the output from MDM.032 and M.017 working groups are being translated into EASA rulemaking and NPAs have been published, the GACC should discuss EASA's proposals and ensure the responses from Industry and the CAA are co-ordinated wherever possible.	

Owner: GACC

Recommendation 3

Status: Closed

The Regulatory Review Group recommends that the CAA approach to regulating non-EASA aircraft should be investigated as part of the GACC's review of the EASA proposals.

Context:

Whilst EASA will detail how GA is to be regulated, this will only apply to EASA aircraft.

Status Report:

The CAA has borne this in mind in responding to industry's requests for removal or easing of regulation, such as the de-regulation of single-seat microlights and removal of the overflight restriction for some permit to fly aeroplanes. At the same time the CAA remains mindful that EASA may in future decide that some aircraft, currently outside the scope of EU Regulation, should be brought within the scope of that regulation.

Next Steps:

None

Owner: None

Recommendation 4

Status: Closed

The Regulatory Review Group recommends that the CAA, with input from Industry, investigates methods for improving safety education amongst the GA community generally. In particular, the Group recommends that the CAA facilitates safety education for GA pilots through, inter alia, the medium of reinstated hard copy Safety Sense Leaflets.

Context:

The analysis conducted by the Regulatory Review Group indicated a need for improved pilot education. In particular, loss of control in visual conditions was the most common accident category for all classes of aircraft. For aircraft other than helicopters, lack of flight handling skills and lack of training, currency and/or experience were the most frequently allocated factors for fatal accidents involving loss of control.

Status Report:

The General Aviation Safety Promotion and Education Review (GASPER) was initiated in February 2007 and made its final report in November 2007. Furthermore, a joint CAA/Industry initiative known as the 'Aviation Safety Communication and Education Programme' (ACEP) has been established. A number of areas have been identified for improvement and the ACEP has initiated a series of initiatives and is actively engaging with the GA industry through various events and publicity campaigns. Hard copy Safety Sense leaflets have been reinstated and distribution is well under-way.

Next Steps:

Continue to discuss and implement methods for improving safety education in the GA

industry.

Owner: ACEP

Recommendation 5

Status: Closed

The Regulatory Review Group recommends that the CAA should use the Group's GA fatal accident statistics to identify high-risk areas for attention in flight training and biennial reviews.

Context:

The analysis showed that the most common accident category for helicopters was loss of control in poor visibility and/or night conditions, which tended to involve pilot disorientation, whilst many of the fatal aeroplane accidents involved stall/spin scenarios.

Status Report:

The General Aviation Safety Review Working Group is continuing its work on analysing accident statistics obtained from various sources, including the Regulatory Review Group, and has identified a number of significant causal factors. The CAA is committed to supporting the work of GASRWG which is set to continue for the foreseeable future.

Next Steps:

Continue to review accident statistics and identify high-risk areas with a view to developing appropriate safety interventions or initiatives.

Owner: GASRWG

Recommendation 6

Status: Closed

The Regulatory Review Group recommends that the CAA carries out further work to investigate possible correlation between regulatory regime and GA Fatal Accident Rates (FARs) and causal factors. One area of investigation could be the licensing/training regime.

Context:

The estimated FAR per 100,000 hours for the group of aircraft in the conventional aeroplane full regulation category were statistically better than those for aircraft in the devolved and self-regulation groups. In comparison, the FAR for fully regulated helicopters is very similar to self-regulated gliders, paragliders and partially devolved microlights.

Status Report:

The GASRWG conducted a broad study which concluded that there is currently no discernable correlation between fatal accident rates and the regulatory regime. However, it was agreed that it is important to review the situation as new regulation is developed.

Next Steps:

Periodically analyse the fatal accident rates and highlight any correlations with the regulatory regime.

Owner: GASRWG

Recommendation 7

Status: Closed

The Regulatory Review Group recommends that the CAA and Industry campaign for a common standard for the collection of fatal GA accident information, including causal factors, from European Member States. This should also include an estimate of utilisation so that FARs can be calculated.

Context:

Meaningful comparison of the UK with other States was not possible due to differences in the definition of GA and the lack of available information, particularly utilisation.

Status Report:

EASA and the European Commission have identified the need for a common standard for the collection of GA fatal accident information and have begun work in conjunction with the development of a Europe-wide accident database, although it has been recognised that the task will be difficult to achieve due to variances in the level of reporting throughout European States. The GASRWG has been and will continue to work in conjunction with EASA and the Commission to achieve a common standard.

Next Steps:

Continue liaising with EASA and the European Commission to develop a common standard.

Owner: GASRWG

Recommendation 8

Status: Closed

The Regulatory Review Group recommends that the CAA carries out further work to determine the most appropriate form of safety forecast/target to be used for GA, including whether GA should be divided into separate classes of aircraft or types of activity. This work should include a review of systems used in other States.

Context:

The current CAA methodology for producing safety forecasts was considered to be appropriate. Safety targets are, however, notoriously difficult to establish and many questions remain as to their final form.

Status Report:

A study has been carried out by CAA SIDD and a final report was presented to GACC in June 2008. The report recommended a number of changes to the current forecasting technique which are being implemented by the CAA.

Next Steps:

Implement changes in forecasting recommended in the report and monitor effectiveness.

Owner: CAA (tbc with SIDD)

Recommendation 9	Status: Closed
<p>The Regulatory Review Group recommends that the CAA should report the results of its Global Navigation Satellite System (GNSS) Approach Trials as soon as practicable, with a view to expediting approval of GNSS approaches to all appropriate aerodromes used by GA aircraft, if so indicated by the trial results.</p>	
<p>Context:</p> <p>The CAA is currently trialling GNSS approaches and is due to publish the results in early 2007. The results are expected to enable the CAA to assess whether the use of GPS approaches is safe and practicable in terms of design and flight management aspects, and is therefore fit for approval.</p>	
<p>Status Report:</p> <p>The CAA has published the results of the GNSS trials as well as publicity information and guidance documents. Initially few aerodromes applied so further guidance material has been published with the aim of simplifying the application process.</p>	
<p>Next Steps:</p> <p>None</p>	
<p>Owner: n/a</p>	

Recommendation 10	Status: Closed
<p>The Regulatory Review Group recommends that the CAA should ensure, through monitoring, that any proposed increases in controlled airspace do not exceed the minimum required for demonstrated safety reasons and to satisfy the environmental considerations. In addition, the CAA should act to ensure that adequate and equitable access to airspace is provided for and achieved and have an active programme of periodic review of the need for existing controlled airspace.</p>	
<p>Context:</p> <p>UK airspace is a national asset and private sector Air Navigation Service Providers (ANSPs) are given the privilege and responsibility of managing it for all users. Adequate and equitable access to airspace should be achieved by an active CAA programmed review of controlled airspace requirements and monitoring of ANSP infrastructure, eg monitoring of access refusals to ensure ANSPs give appropriate priority to transit and GA traffic.</p>	
<p>Status Report:</p> <p>The CAA's Airspace Change Process ensures that the requirements of all airspace users are considered whenever an airspace change proposal is made. Furthermore, the CAA operates a post-implementation review procedure that it uses to assess the effectiveness of any new airspace arrangements. Combined with industry input in to the National Air Traffic Management Advisory Committee (NATMAC) it is felt that the CAA now fulfils the requirements of this recommendation.</p>	
<p>Next Steps:</p> <p>None</p>	

Owner: n/a

Recommendation 11

Status: Closed

The Regulatory Review Group recommends that the CAA invites the Ministry of Defence (MoD) to review its policy on access to military aerodromes and consider addressing the issue of military controllers understanding GA (and vice versa) through the medium of Military/Civilian Air Safety Days.

Context:

There is a reduction in GA activity at MoD aerodromes due to complicated access and indemnity requirements.

Status Report:

Discussions have established that the MoD are open to use of military aerodromes by GA but for various operational reasons it does not wish to encourage civil GA activity. The ShAirspace initiative, a joint Civil/Military effort to facilitate discussion and the sharing of new ideas, is gaining momentum and it is felt that along with the established Military/Civilian Air Safety Days (MCASD) communication on a number of issues of mutual interest has improved considerably.

Next Steps:

None

Owner: n/a

Recommendation 12

Status: Closed

The Regulatory Review Group recommends that the CAA considers, in conjunction with the appropriate Industry bodies, re-aligning the current UK classification of sailplanes with the European model.

Context:

UK sailplanes fall into four different categories compared to just two categories in Europe.

Status Report:

The CAA and British Gliding Association (BGA) are in the process of agreeing a method for integrating the UK classifications in to the European model. Progress is being made and both the CAA and BGA recognise that this task must be completed in advance of EASA assuming responsibility for Ops and Licensing.

Next Steps:

Agree a suitable classification model for integration with the European model.

Owner: CAA & BGA

Recommendation 13	Status: Open
<p>The Regulatory Review Group recommends that, following completion of the MDM.032 activity and associated EASA Working Groups, the CAA should review its Certificate of Airworthiness (CofA) and Permit to Fly (PtF) policy to establish, where possible and appropriate, compatibility with future EASA policy.</p>	
<p>Context: Several EASA Working Groups are currently debating Permits to Fly, the list of Annex II aircraft and the outcome of these groups will impact on future CAA policy.</p>	
<p>Status Report: Whilst EASA has not yet defined its policy regarding the issue of Permits to Fly, the criteria under which an aircraft will qualify for a CofA and when it will not is now clearer. The CAA is reviewing the output of MDM.032 and other working groups and will continue to do so until the activity is complete.</p>	
<p>Next Steps: Continue to review output from EASA working groups and provide input accordingly.</p>	
<p>Owner: CAA</p>	

Recommendation 14	Status: Closed
<p>The Regulatory Review Group recommends that the CAA and the GA community seek to influence, at every opportunity, the Commission, EASA and the European Parliament to ensure that the detailed preparatory work to extend the remit of EASA is undertaken at an appropriate pace to ensure that the future regulatory structure is both pragmatic and viable before ceding legal competence to EASA.</p>	
<p>Context: The Regulatory Review Group is concerned that the Commission and EASA are moving too fast in trying to extend the remit of EASA to cover Operations and Licensing matters.</p>	
<p>Status Report: Since this recommendation was made, the CAA and GA Industry have worked together much more efficiently and all parties have become more actively engaged in reviewing and commenting on output from EASA. Although the volume of output is still high it is felt that the present situation is much more comfortable than at the time of the Regulatory Review.</p>	
<p>Next Steps: Continue to review and comment on rulemaking proposals from Europe.</p>	
<p>Owner: CAA & GA Industry</p>	

Recommendation 15	Status: Closed
<p>The Regulatory Review Group recommends that the Industry/CAA officials on the MDM.032 Working Group should endeavour to present unified views thereby</p>	

influencing the debate on how EASA should regulate GA.

Context:

The establishment of the Regulatory Review Group in September 2005 has allowed the GA community and CAA to debate the options for a future regulatory structure. There is considerable agreement between the parties and it is therefore important that, wherever possible, a unified view is expressed in the EASA MDM.032 Working Group by the UK members.

Status Report:

The CAA and GA Industry are working together much more effectively than when the Regulatory Review Report was published and it is felt that that there is no reason to suggest this relationship shouldn't continue for the foreseeable future.

Next Steps:

Continue to provide a unified view where possible when working to influence EASA, whilst acknowledging that differing views may still be held.

Owner: CAA & GA Industry

Recommendation 16

Status: Open

The Regulatory Review Group recommends that Industry considers further devolution and/or delegation, in conjunction with the CAA, in the issue, renewal of PtF or Cs of A, modifications and reissue of Certificates of Validity (Cs of V) for non-EASA aircraft.

Context:

A CAA Feasibility Study has shown that there appears to be scope for further devolution or some delegation, to the GA community/approved companies, in some certification areas for non-EASA aircraft.

Status Report:

An outline proposal of the review of BCAR's as they pertain to remaining Annex II types has been carried out and identified a number of strategies to be pursued. The CAA remains mindful of the fact that although EASA may in future amend the provisions of Annex II such that more aircraft fall within the EASA legislative framework, there is still a need to amend BCARs in order to align with the further devolution of tasks to industry

Next Steps:

Continue work on reviewing BCAR's and identifying further opportunities for increased devolution or delegation.

Owner: CAA & GA Industry

Recommendation 17

Status: Closed

The Regulatory Review Group recommends that the list of GA consultative forums, their participants and Terms of Reference (ToR) should be placed on the CAA

website.
Context: The CAA consults extensively with many parties but the details of these groups are not transparent to the GA community.
Status Report: A list of forums has been placed on the CAA website. The gathering and updating of Terms of Reference for all groups is an ongoing process.
Next Steps: Ensure list of consultative forums and associated Terms of Reference on CAA website are kept up to date by routine review at regular intervals.
Owner: CAA

Recommendation 18	Status: Closed
The Regulatory Review Group strongly endorses the concept of an Issues Log and recommends that this should be taken forward as a permanent mechanism for consideration by the GACC.	
Context: The GA community has many issues with CAA regulation and would like to propose ideas for improvement and considers that an Issues Log would enable them to represent their concerns and ideas, formally, to the CAA and for any subsequent action to be tracked until the issue is resolved.	
Status Report: The GA Issues Log was opened in October 2006 and remains open with some extant issues to be resolved once the outcome of EASA rulemaking is known. Since the initial logging of issues only two new entries have been received, but the Issues Log mechanism, which is documented and accessible on the CAA website, remains available to GACC members to raise issues that will then be tracked and reported on until resolved or otherwise closed.	
Next Steps: Maintain the GA Issues Log process for recording, tracking and resolving issues raised by the GA Industry representatives.	
Owner: CAA	

Recommendation 19	Status: Closed
The Regulatory Review Group recommends that, whilst the National Air Traffic Management Advisory Committee (NATMAC) is in the process of reviewing its ToR, the GACC should also undertake a similar exercise. In addition, it is recommended that the membership of GACC should be expanded to include the DfT and, if deemed necessary, other CAA Groups such as the Economic Regulation Group (ERG).	

Context:

Industry and CAA agree that, for regulatory matters, NATMAC and the GACC should be the principal focal points for GA debate.

Status Report:

GACC Terms of Reference were reviewed and its membership was expanded to include the British Rotorcraft Association and the British Balloon & Airship Club and a new CAA member Mrs Pat Ricketts, formerly of the DfT, who had joined the CAA as European Affairs Focus. David Shepherd, the DfT GA Focal Point, was subsequently confirmed as a member of GACC

Next Steps:

Conduct a periodic review of GACC Terms of Reference in conjunction with the work identified as Next Steps for Recommendation 17.

Owner: CAA