CRD TO NPA 2008-22B AND 2009-02D
AUTHORITY REQUIREMENTS

COVER REGULATION PART-AR

(CRD b.1)

Commentor:	UK CAA

Page 3 - Paragraph No: Article 1

Comment:

The current text does not clearly establish the applicability (which is limited to operations and personnel licensing).

Justification:
As currently worded the regulation would encompass all areas under the EASA remit.

Proposed Text:
(..) 'and specifically' (…) to be deleted.

Commentor:	UK CAA

Page 3 - Paragraph No: Article 2 - Definitions

Comment:
Where an agreed acronym for any definition exists, the acronym should be included in the text of the definition.

Justification:
For improved clarity.

Proposed Text:
'Acceptable Means of Compliance (AMC)' are …

Commentor:	UK CAA

Page 4 - Paragraph No: Article 4, Para 4

Comment:
Need to insert 'as appropriate' in the context of empowerment for tasks.

Justification:
Some Competent Authority personnel will need to be empowered for only some but not all of the listed tasks.

Proposed Text:
Amend to read: **'…** empowered **as appropriate** to perform…'

Commentor:	UK CAA

Page 6 - Paragraph No: Article 6

Comment:
Should the 12 months allowed for transfer of records from Competent Authorities to the Agency begin on entry into force of the Regulation or the date of applicability?

Justification:
Competent Authorities will continue to be responsible for the oversight of the relevant organisations until the date of applicability of the Regulation, so it is questionable whether legally or practically they could transfer records before that date.

Proposed Text:
Replace "from the entry into force of this Regulation" with "from the applicability of this Regulation."