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Document	Reference	Proposal / comment	Justification
<b>Resulting Text to Part-CAT (S+B) (CRD b.3)</b>	GENERAL COMMENT	<p>It may appear obvious, but the terms 'Motor-Powered Aircraft' and 'Non-Motor-Powered Aircraft' are introduced but not defined. It seems clear that sailplanes and balloons are non-motor-powered aircraft and aeroplanes and helicopters are motor-powered aircraft but it is not clear where an airship might fit for example.</p> <p>It is recommended that consideration be given to provide definition of these terms.</p>	Clarity and definition.
	GENERAL COMMENT	The UK supports the need for a set of Rules pertaining to Commercial Air Transport in Sailplanes. Whilst it is true that there is no practical demand for A-B Commercial Air Transport in Sailplanes and currently all sailplane flights are for private recreational or training purposes, it cannot be ruled out that an operator may wish to operate sailplanes for Commercial Air Transport purposes in the future. Similar arrangements already exist in the UK for light aeroplanes used for pleasure flights and 'adventure sport' purposes where passengers are carried and no training takes place.	
	CAT.IDE.S.110(a)(3) CAT.IDE.S.115(c) CAT.IDE.B.115(b)(3) AMC1- CAT.IDE.S.110(a)(3) & CAT.IDE.S.115(c) GM1-CAT.IDE.B.115(b)(3)	<p>The term 'pressure altitude' as used specifically in these IDE sections is not correct.</p> <p>Amend the term to '<b>barometric altitude</b>'.</p> <p>ICAO have been informed of this error in Annex 6.</p>	Correct terminology.
	CAT.GEN.NMPA.125	<p>In order to provide a more realistic requirement, amend text to:</p> <p>The operator shall, at all times, have available for</p>	The emergency and survival equipment carried on board balloons and sailplanes may

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		immediate communication to rescue coordination centres (RCCs) <del>lists containing</del> information on the emergency and survival equipment carried on board.	change frequently according to the flight being undertaken. Furthermore it is considered that the amount of equipment usually carried is small enough for the operator to be able to recall from memory.  See additional comment for AMC1-CAT.GEN.NMPA.125.
	CAT.GEN.NMPA.140	The choice to list documents, manuals and information to be carried here for both sailplanes and balloons may be more clearly written if the two were separated into separate requirements.	Balloons and sailplanes are very different flying machines. Balloons have little (if any) areas in the basket that are suitable for the storage of required documents. This requirement should be reviewed and re-written as separate requirements.
	CAT.GEN.NMPA.140	Amend text to read:  (b) Notwithstanding paragraph (a) for operations <b>under visual flight rules (VFR) day</b> : (1) taking off and landing at the same aerodrome/operating site; or (2) remaining within a distance or area specified in the operations manual, the following documents and information may be: (i) carried in the retrieve vehicle, for flights with balloons; or (ii) retained at the aerodrome/operating site, for flights with	It is not clear why this requirement should only apply to VFR flights by day and not to IFR flights or flight at night. The Agency has proposed in its NPA 2011-16 a Cloud Flying Rating permitting flight in cloud by sailplanes which, according to Part-SERA and ICAO Annex 2, must be conducted in

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		<p>sailplanes:</p> <ul style="list-style-type: none"> <li>(A) noise certificate</li> <li>(B) aircraft radio licence</li> <li>(C) journey log, or equivalent</li> <li>(D) aircraft technical log</li> <li>(E) NOTAM/AIS briefing documentation</li> <li>(F) meteorological information</li> <li>(G) passenger manifests</li> <li>(H) notification of special categories of passenger</li> <li>(I) mass and balance documentation.</li> </ul>	<p>accordance with the IFR. Carriage of documents on board aircraft on IFR flights at night has no additional benefits compared to VFR flights by day.</p> <p>It would seem that this comment is equally relevant to Part-NCO. The UK did not make such a comment in its response to the Part-NCO CRD as at the time of the consultation IFR flight in sailplanes was prohibited.</p>
	CAT.GEN.NMPA.140(a)	The carriage of original documents, either within the balloon basket or the retrieve vehicle is not recommended. Certified true copies would be preferred.	<p>Balloons have little (if any) areas in the basket that are suitable for the storage of required documents. Whether within the balloon basket or the retrieve vehicle, documents would be likely to become damaged very quickly. It is then sometimes difficult and often expensive to replace said documents.</p>
	CAT.GEN.NMPA.140(b)	1) This list of documents that may be carried in the retrieve vehicle is encouraging. However, it should be expanded to include the following: the aircraft flight manual; the certificate of registration; the certificate of airworthiness; a copy of the AOC; the AOC ops spec; the	1) Balloons have little (if any) areas in the basket that are suitable for the storage of required documents. Larger documents, for example the aircraft flight manual, would

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		<p>insurance certificate; and some "other documentation".</p> <p>2) This list of documents that may be carried in the retrieve vehicle includes the passenger manifest. A copy of this should be carried in BOTH the balloon basket and the retrieve vehicle.</p>	<p>be a safety hazard to carry in the balloon, as it could hit or be hit by an occupant during a fast landing.</p> <p>2) In the event of an accident, incident or occurrence during the flight or landing, it is important that the pilot has a copy of the passenger manifest in dealing with the emergency services. Likewise, if the pilot is incapacitated, the retrieve driver also requires the passenger manifest for the same reason.</p>
	CAT.OP.NMPA.130(b)	Delete the word "all". Revised paragraph to start: "is familiar with available meteorological information..."	It is impossible for any single entity to make him/herself familiar with <u>all</u> available meteorological information.
	CAT.OP.NMPA.150	Sometimes, especially on a morning balloon flight, the visibility may get worse for a brief period during the flight period. Clearly, if it is not safe to immediately land, the pilot must continue to fly. Consider the removal of the words "or continue".	A balloon pilot cannot choose to immediately land if the ground below him and immediately downwind is not suitable to effect a safe landing.
	CAT.OP.NMPA.165	With reference to Explanatory Note – paragraph 80, the deleted paragraph concerning flight in IMC by artificial means should be reinstated. With the introduction of the Sailplane Cloud Flying Rating it can be expected that flight	The Agency may wish to reconsider the deletion of the text due to the possibility of future requirements.

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		in IMC by artificial means in sailplanes will become more prevalent.	
	CAT.OP.NMPA.185	It is unclear whether this requirement is for ALL balloons, or just for hot-air balloons. The potential dangers of landing a balloon at night are the same for any balloon. However, if the requirement is only for hot-air balloons, these do not carry ballast. Suggest EASA clarification and re-draft.	Night landings present a safety problem for ALL balloons, not just hot-air. However, hot-air balloons require fuel, not ballast and gas balloons require ballast and not fuel.
	CAT.POL.S.110(b)	This is a requirement under the Rules of the Air. It is proposed that paragraph (b) be deleted.	This requirement is in SERA Part A para 3.1.2.1.
	CAT.POL.B.115(b)	<p>A balloon does not have an engine (other than a hot-air airship).</p> <p>This is a requirement under the Rules of the Air. It is proposed that paragraph (b) be deleted.</p> <p>For information, if the entire heating system (of a hot-air balloon) failed, then an emergency landing would be required. In so doing within a congested area, it would probably be impossible to do so "without causing undue hazard to persons or property on the ground".</p> <p>Total failure of a hot-air balloon's heater system is extremely rare and would result in an immediate emergency (e.g. fire in the basket with pilot extinguishing all burners; or contaminated propane). Many balloons have double, triple or quad burner systems, with all systems duplicated. It is likely that a technical failure would only affect a single burner. Some smaller balloons only use a single burner and, like single engine aeroplanes, could be more of a</p>	This requirement is in SERA Part A para 3.1.2.1.

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		potential hazard whilst over congested areas.	
	CAT.IDE.S.130(a)	It is recommended that the text be amended to include wearing of the life-jacket rather than just stowed in an accessible place as it may not be feasible to don the jacket in the aircraft. Additionally consideration might be necessary to ensure that any worn life-jacket does not interfere with parachute operation or vice versa.	Practicality of stowing and donning life-jackets in gliders.
	CAT.IDE.S.140(a)	Replace with text from CAT.IDE.A/H.330: (a) Sailplanes shall be equipped with radio communication equipment required by applicable rules of the air or airspace requirements.	Clarification of requirement.
	CAT.IDE.B.110	Delete para (a) Or Replace with: (a) lights as required by Part-SERA.	A position light is a requirement in the Rules of the Air along with an anti-collision light. It is not appropriate for the position light to be repeated in this Rule.
	CAT.IDE.B.120	UK CAA is very pleased to note that this requirement is included.  Over a number of years, too many balloon pilots (who cannot "hold on" during the landing phase) have been ejected from the basket and sometimes "ran over" by the basket causing very serious injuries. The loss of weight could cause the balloon to become airborne again, with passengers still on board, but with no pilot.	
	CAT.IDE.B.150	The miscellaneous equipment for hot-air balloons and mixed	Standardisation and

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		<p>balloons are listed here. There appears to be no similar listing for gas balloons. The list is fully supported, with the exception of items (e) and (f). UK ballooning does not regularly use a hook knife, nor can it be envisaged why it would need to be carried. It would however be essential in a gas balloon. A fire blanket / cover is a good idea, but there may be nowhere within the basket to store it.</p> <p>It is recommended that requirements for gas balloons be included.</p>	completeness.
	CAT.IDE.B.155(a)	<p>Replace with text from CAT.IDE.A/H.330:</p> <p>(a) Balloons shall be equipped with radio communication equipment required by applicable rules of the air or airspace requirements.</p>	Clarification of requirement.
	GM1- CAT.GEN.NMPA.105(c)(3)	<p>Item (a) should be re-drafted as:</p> <p>(a) <b>long sleeved upper body clothing and trousers both preferably made out of natural fibres or specialised fire retardant mixed fibres;</b></p>	The wearing of natural fibres offers a significant safety advantage against plain mixed fabrics in so far as burn injuries are concerned.
	AMC1 - CAT.GEN.NMPA.125	<p>Amend text to read:</p> <p>CONTENT OF INFORMATION</p> <p>The information should include, as applicable, the number, colour and type of life rafts and pyrotechnics, details of emergency medical supplies, water supplies and the type and frequencies of the emergency portable radio equipment.</p> <p><b>LIST TO BE COMPILED</b></p> <p><b>The operator of an aircraft that carries a large amount of emergency and survival equipment should maintain a list of such equipment in order to eliminate the</b></p>	See comment on CAT.GEN.NMPA.125.

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		<b><i>potential for the operator to omit any items when communicating with RCCs.</i></b>	
	AMC1-CAT.POL.B.110(a)(8) and (b)	Item (a)(2). The flight number is not relevant for CAT ballooning as flight numbers are not normally used for hot-air balloon pleasure flights. The date is of course required.	Balloon registration should suffice in lieu of a flight number.