

Consultation Reply Document:

Legislation for new types of Vertical Take-Off and Landing (VTOL) aircraft

Part A: Overview

CAP3318A

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PART A

Overview

Context

The emergence of new types of VTOL (Vertical Take-Off and Landing) aircraft and associated technologies has the potential to broaden and enhance the reach of civil aviation. The UK Government has set an objective to see piloted 'eVTOL' operations in the UK from 2028 and has established the Future of Flight programme to help deliver this objective. The CAA's [eVTOL Delivery Model \(CAP 3169\)](#) set out our ambition to implement the regulatory framework and operational systems required to enable initial commercial passenger operations by the end of 2028.

Whilst it is possible to operate new types of VTOL aircraft today for testing and demonstration purposes, existing legislation does not always provide for their routine operation. The CAA, sponsored by the Department for Transport, is identifying the proposed regulatory changes needed to accommodate the safe use of these new types of VTOL aircraft in the UK. Following our [initial consultation \(CAP 3186\)](#) and [consultation reply document \(CAP 3240\)](#) on the policy frameworks for new types of VTOL, the CAA consulted further on the detail of these frameworks – specifically covering Complex Motor-Powered Aircraft (CMPA), continuing airworthiness, pilot licensing and flight operations regulations. These consultations were published as a [package of five documents \(CAP 3267 A-E\)](#) on 28th May 2026. This consultation reply document summarises the feedback provided and our proposed way forward.

Consultation summary

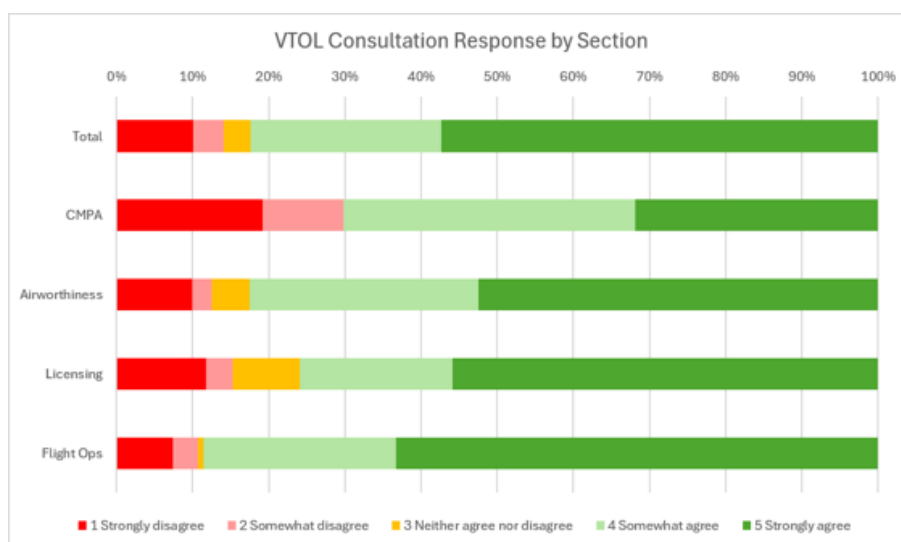
The CAA received 15 responses to the consultation. These comprised responses from 12 organisations and 3 individuals. Organisational respondents included aircraft manufacturers, operators, public bodies and academic institutions. Overall, the proposals received strong support from respondents. Across all 49 consultation questions, 82% of responses strongly agreed or somewhat agreed with the proposals, 4% neither agreed nor disagreed and 14% somewhat disagreed or strongly disagreed. The level of support by section is summarised below.

Common themes raised across the consultation included:

- the need for regulation to be proportionate to the risks associated with the aircraft and its intended operation;
- the benefits of using performance-based and technology-neutral requirements;
- the need for clarity about how the proposed requirements would be applied in practice;
- the importance of compatibility with other international regulatory frameworks;

- the need to avoid unnecessary differences between requirements applying to new types of VTOL aircraft and equivalent conventional aircraft;
- the treatment of aircraft-specific characteristics through certification, operational suitability data, acceptable means of compliance and guidance material; and
- the timing and sequencing of implementation, including the availability of supporting guidance and transitional arrangements.

The following section sets out a summary of our consultation proposals in each section, feedback received and our proposed way forward.



Definitions for new types of VTOL

During the consultation period, the CAA identified that the approach proposed to VTOL definitions set out in CAP 3186 and 3267 does not adequately capture all foreseeable VTOL designs.

The CAA's initial proposal was to use **Powered Lift**, **Helicopter** and **Non-Conventional Helicopter (NCH)** definitions to define new types of VTOL aircraft. These definitions were developed to distinguish between aircraft with different means of generating lift (powered lift for dual-mode aircraft and helicopter for rotor-borne respectively) and, in the case of NCH, helicopters that lack the capability to perform a controlled emergency landing.

This approach creates a gap for aircraft that:

- rely solely on multiple rotors for both lift and propulsion,
- do not utilise an aerofoil or wing to provide lift in forward flight, and
- are capable of meeting the certification requirements for a controlled emergency landing.

Under this proposed framework, these aircraft, colloquially known as Multicopters, neither fit comfortably within the Powered Lift definition, nor align with the original intent of the Non-Conventional Helicopter definition. The CAA now consider that the principal characteristic for these new aircraft should be their method of producing lift, and that the definition of NCH is not required.

This distinction has become important as new designs emerge that rely solely on multiple rotors yet are expected to meet the required certification standards in SC-VTOL for a controlled emergency landing.

The CAA will instead be recommending the introduction of a term and definition, **Multicopter**, to replace the proposed Non-Conventional Helicopter term and definition. Alongside **Powered Lift**, this would create two distinct VTOL categories based on the primary method by which lift is generated:

- **Powered Lift** - "A heavier-than-air aircraft capable of vertical take-off, vertical landing, and low-speed flight, which depends principally on engine-driven lift devices or engine thrust for lift during these flight regimes and on non-rotating aerofoil(s) for lift during horizontal flight."
- **Multicopter** - "A helicopter supported in flight chiefly by the reactions of the air with more than two power-driven rotors on substantially vertical axis."

The introduction of the Multicopter definition addresses the identified gap and provides several advantages:

- Aircraft are categorised according to their fundamental design and method of generating lift.
- Rotor-only VTOL aircraft capable of certification are clearly accommodated.
- The distinction between aircraft design and certification pathway is maintained.
- The framework becomes simpler, consisting of two clear VTOL categories: Powered Lift and Multicopter. This reduces the number of new definitions and categorisations from that which was proposed in CAP 3267.
- The approach aligns with the existing treatment of aeroplanes and helicopters, where aircraft type definitions are separate from their certification or operational approval status.

Document Summary

Part B: Complex Motor-Powered Aircraft (CAP3267B)

In CAP3186 and CAP3240, the CAA confirmed that it would treat all new types of VTOL aircraft as Complex Motor-Powered Aircraft by default. This will ensure that aircraft are maintained to the highest standards, and that they are operated to the highest standards. It ensures that both operational oversight and maintenance standards are aligned with the complexity and types of operations these aircraft can be used for.

However, we also acknowledge that there may be cases where treating a new type of VTOL aircraft as CMPA may not be proportionate for certain operational regimes. In CAP3186, we proposed that the CAA have a discretion to determine whether a specific new type of VTOL aircraft can be excluded from the CMPA regime. Part B set out the proposed mechanism in more detail. Specifically, the consultation proposed:

- To introduce an application process, with an application submitted by the Design Approval Holder to have an aircraft treated as non-CMPA.
- To introduce eligibility criteria for this application process, including (i) Maximum Take-Off Mass (MTOM) (ii) operations limited to private, recreational flights (i.e. non-commercial) and (iii) submission of a risk assessment.
- For non-CMPA status to be granted subject to the above eligibility criteria being met, acceptance of the risk assessment by CAA following a technical review, and possible operational restrictions imposed by the CAA.

Consultation responses showed broad support for the CAA's overall approach of treating new VTOL aircraft as Complex Motor-Powered Aircraft (CMPA) by default, while allowing a discretionary process for lower-risk aircraft to be treated as non-CMPA where appropriate. Respondents generally supported a proportionate, risk-based framework that maintains safety while enabling innovation, although some stakeholders expressed concerns regarding predictability, the use of discretion, and the proposed eligibility criteria.

Key themes raised by respondents included:

- Support for a default CMPA classification, with flexibility to accommodate lower-risk aircraft through a discretionary process.
- Requests for clearer eligibility criteria and greater certainty regarding the evidence required to support non-CMPA applications.
- Concerns that Maximum Take-Off Mass (MTOM) alone may not be sufficient to determine aircraft complexity and that wider factors should be considered.
- Support for a risk-based assessment considering aircraft design, operations, maintenance, training, and third-party risk.

- Calls for greater transparency, published decisions, and clearer guidance on the non-CMPA classification process.

Following our review of consultation responses and a further internal review, the CAA intends to proceed with its policy that new VTOL aircraft will be classified as CMPA by default. However, a number of refinements will be made to the proposed discretionary framework to ensure proportionality and safety. With the introduction of Multicopter and removal of Non-Conventional Helicopter, changes to the MTOM threshold will be made with the existing 600 kg threshold associated with Non-Conventional Helicopters being removed and a common discretionary threshold of 1200 kg to be adopted for both Powered Lift and Multicopter aircraft. The CAA has also decided to amend the proposed operational criteria alleviating from certain requirements to enable the aircraft to be used for recreational training purposes.

Part C: Continuing Airworthiness (CAP3267C)

The requirements for continuing airworthiness are set out in UK Regulation (EU) No 1321/2014. The CAA policy position is that the current continuing airworthiness framework and requirements are well established and are suitable for new types of VTOL aircraft. We therefore intend to apply the current continuing airworthiness framework and requirements to Powered-Lift and Multicopters. This approach will ensure new VTOL aircraft will be subject to the same high maintenance standards with the same level of oversight that applies to existing aircraft.

In line with the CAA's wider proposed approach to the new regulatory framework, bespoke provisions will only apply to Powered Lift and Multicopters where and when the CAA considers this to be required for safety reasons and/or to capture novel technology. To enable this, Article 3 was proposed to be amended to reflect that Powered Lift aircraft are treated as aeroplanes, and Multicopters are treated as helicopters unless relevant legislation specifies otherwise.

The consultation proposed changes to the regulations related to continuing airworthiness tasks, complex maintenance tasks, maintenance implementation procedures, pilot-owner maintenance and continuing airworthiness organisations. They also included changes required to align to CMPA proposals set out in Part B, and other changes to UK Regulation (EU) No 1321/2014 currently being progressed under [RMT.0201](#) including the addition of the electric powerplant category to the engineer's licensing requirement.

The consultation responses demonstrated strong overall support for the CAA's proposed continuing airworthiness framework for new VTOL aircraft, with a clear majority of respondents agreeing that existing continuing airworthiness regulations should largely be applied to Powered-Lift and Multicopter aircraft, with amendments where necessary. Respondents generally supported the use of established Part-M, Part-ML and Part-CAO frameworks, recognising that this approach promotes regulatory consistency, safety and legal certainty.

Key themes raised by respondents included:

- Support for applying existing aircraft continuing airworthiness requirements to new VTOL designs, while recognising the need for aircraft-specific requirements where novel technologies are involved.
- Support for recognising high-energy batteries, distributed propulsion systems, lift/thrust units and related control systems as safety-critical maintenance items requiring enhanced oversight.
- Concerns from some respondents that certain proposals may be overly restrictive, particularly regarding modular maintenance tasks and the exclusion of VTOL aircraft from some single-person Part-CAO privileges.
- Calls for proportionality, clear guidance material and alignment with wider proposals relating to non-CMPA classification.

Having considered the consultation responses, the CAA intends to proceed with the proposed continuing airworthiness framework. The responses have reinforced the view that existing continuing airworthiness regulations provide an appropriate foundation for regulating new VTOL aircraft, while targeted amendments are necessary to address emerging technologies and unique aircraft characteristics.

Part D: Pilot Licensing (CAP3267D)

The requirements for personnel licensing are set out in UK Regulation (EU) No 1178/2011 and the Air Navigation Order 2016. We consider that the current licensing framework and requirements are well established and are suitable to enable a personnel licensing pathway for new types of VTOL aircraft. We therefore intend to use the current framework and the specific requirements for the Powered-Lift category principles, only amending the regulations where necessary to enable Powered-Lift type ratings.

Certification Specifications for Operational Suitability Data—Flight Crew Data (CS-FCD) enables the determination of the specific type rating requirements for new aircraft types. It provides a standardised data-driven process to ensure pilots receive the appropriate training for a particular aircraft type. CAP3267D Question 8 FCL.720.PL proposed changes to the regulations to align the prerequisite requirements to the type of operation being flown. This approach will enable a pathway for commercial and non-commercial operations which promotes safety while enabling innovation.

The material proposals we set out in this consultation related to:

- Amended definitions for new types of VTOL;
- Licence privileges for Powered-Lift type ratings;
- Instrument Rating (IR) and Night Rating privileges on powered-lift aircraft;
- Amendments to experience requirements and pre-requisites for the issue of Powered-Lift Type Ratings;

- Emphasis on the importance of the Operational Suitability Data (OSD) in determining rating prerequisites, training requirements, and aircraft-specific competencies.
- Retention of the helicopter type-rating, instructor and ATO frameworks with limited amendments where necessary to accommodate powered-lift and multicopter types;
- Amendments to the Air Navigation Order 2016 to ensure consistency with the revised Aircrew Regulation and support the integration of innovation into the UK aviation system

Consultation responses showed broad support for introducing Powered-Lift through the existing pilot licensing framework, with stakeholders favouring a flexible, internationally harmonised approach. Respondents supported recognition of existing pilot competencies for IR supported by Powered-Lift type ratings. A recurring theme in the responses was that aircraft-specific training, checking and experience requirements should be driven by Operational Suitability Data (OSD) rather than prescriptive regulations. The most significant concern related to mandatory cross-category flight-hour prerequisites, which was considered overly restrictive, irrelevant to some aircraft designs, and a possible source of negative transfer of skills.

Following consideration of consultation feedback, the CAA intends to proceed broadly as proposed with the exception of an amended approach to the prescribed experience requirements and pre-requisites for the issue of Powered-Lift type ratings.

The CAA proposes to remove prescriptive cross-category flight-hour prerequisites in **FCL.720.PL** and introduce operationally dependent IR and MCC requirements. In response to consultation feedback, we recognise fixed aeroplane and helicopter experience requirements may not be suitable for the diverse range of emerging Powered-Lift designs. Instead, aircraft-specific experience requirements and prerequisites for an initial Powered-Lift type rating will be determined through **Operational Suitability Data (OSD)** under Part-21. This approach is intended to provide greater flexibility, support innovation and ensure training requirements remain proportionate to individual aircraft characteristics, allowing for future standardised prerequisites if common powered-lift designs emerge.

Part E: Flight Operations (CAP3267E)

The requirements for flight operations are set out in the UK Regulation (EU) 965/2015. As set out in CAP3186, our proposed approach is to make use of existing definitions, regulations, classifications and principles for new types of VTOL aircraft as far as practical.

Regulations would be based on the core capability of the aircraft – i.e. whether it has characteristics of both an aeroplane and a helicopter, or only those of a helicopter. Where an aircraft has the characteristics of both an aeroplane and a helicopter, it would be treated as Powered-Lift and we would apply aeroplane rules, helicopter rules or a combination of the two, depending on the mode of operation. An aircraft with only the characteristics of a helicopter would be treated as a helicopter.

Applying the principles of existing rules, whenever practical, will expedite our work and help ensure that the new entrants to the aviation market are treated in an equitable fashion with the existing aviation sector.

In this consultation, the most material proposals we set out related to:

- Requirements for a Flight Data Monitoring Programme (FDM) for all aircraft certified under SC-VTOL that are required to have a Flight Data recorder (FDR).
- Requirements for FDRs and Lightweight Recorders for aircraft certified under SC-VTOL.
- The use of Operating Sites by Powered-Lift.
- Fuel schemes for new types.
- Recharging with passengers embarking, on board, or disembarking.
- Overwater operations with new types.
- Performance and Operating Limitations requirements for new types.
- Instruments Data and Equipment required for new types.
- The use of Specific Approvals by new types.

Consultation responses showed broad support for the CAA's proposed approach to integrating new types of VTOL aircraft into the UK aviation system. Respondents generally agreed that existing aviation regulations provide a strong foundation for safe operations, while recognising that targeted changes are needed to address the unique characteristics of new aircraft designs, propulsion technologies and operating concepts.

Following consideration of consultation feedback, the CAA intends to proceed broadly as proposed, with a focus on enabling innovation while maintaining equivalent levels of safety. Key outcomes include:

- Equitably applying existing operational regulations wherever practical, supplemented by specific requirements for powered-lift aircraft where necessary.
- Equitably adjusting existing helicopter operational regulations to accommodate multicopters while also adjusting for the technological differences such as alternate methodologies for achieving a safe forced landing other than autorotation.
- Introducing Flight Data Monitoring (FDM) requirements for applicable aircraft certified to SC-VTOL, to support safety oversight and continuous improvement.
- Enabling operations with new types of VTOL from operating sites using a framework aligned with the established helicopter approach, while accounting for the characteristics of powered-lift aircraft.

- Adopting technology-neutral fuel and energy planning requirements that can accommodate both conventional and electric propulsion systems and creating a performance-based fuel policy, based on the existing fixed wing schemes (basic with variation, and individual) to accommodate other aircraft types equitably.
- Establishing a regulatory framework for battery charging, battery swapping and other energy replenishment activities.
- Adapting requirements for:
 - helicopter overwater operations;
 - aircraft performance;
 - flight recorders;
 - and operational approvals

to ensure they remain appropriate for new aircraft types.

- Supporting specialist and emerging operational concepts through proportionate, performance-based regulation.
- Maintaining alignment with international developments where appropriate, whilst addressing UK-specific operational needs.

Overall, consultation responses reinforced the CAA's view that new types of VTOL aircraft can be safely integrated into the existing aviation system through a combination of established operational regulations and targeted measures to address novel technologies and operational concepts.

Next steps

This consultation reply document sets out our response to feedback provided and our expected way forward. In due course, we will publish our finalised proposals in an opinion and instruction document. Depending on the passage and final form of the Civil Aviation Bill, these changes may be progressed using powers conferred on the CAA by that legislation, or through a Statutory Instrument facilitated by the Department for Transport.

Following these changes, the CAA will consult further on proposed changes to Acceptable Means of Compliance, with final changes implemented alongside legislative change. In parallel, we will look to update any other impacted policy documents or artefacts (e.g. the AIP), whilst putting in place the necessary process changes required to implement this new regulatory framework in practice. This will enable the CAA to meet its objective of having the regulatory framework and operational systems for commercial eVTOL operations in place by the end of 2028.

ANNEX 1

Abbreviations

AAM – Advanced Air Mobility

AMC – Alternative Means of Compliance

AIP – Aeronautical Information Publication

ATM – Air Traffic Management

ATO – Approved Training Organisation

CAMO – Continuing Airworthiness Management Organisations

CAT – Commercial Air Transport

CMPA – Complex Motor-Powered Aircraft

CS FCD – Certification Specific Flight Crew Data

DfT – Department for Transport

EASA – European Union Aviation Safety Agency

GM – Guidance Material

ICAO – International Civil Aviation Organisation

IFR – Instrument Flight Rules

ISMS – Information Security Management System

MCC – Multi-Crew Cooperation

NASP – National Aviation Security Programme

NAA - National Aviation Authorities

OEM – Original Equipment Manufacturer

OSD – Operational Suitability Data

OLS – Obstacle Limitation Surfaces

PPL – Private Pilot's License

RFFS – Rescue and Fire Fighting Service

SMS – Safety Management System

VFR – Visual Flight Rules

VTOL – Vertical Take-off and Landing

ANNEX 2

Summary of Questions

Complex Motor-Powered Aircraft

Question 1: Do you agree or disagree with our overall approach regarding the CMPA discretionary power? Please explain your answer.

Question 2: Do you agree or disagree with the proposed eligibility criteria with the use of MTOM with the proposed limits, and limited to private, recreational flights? Please explain your answer.

Question 3: Do you agree or disagree with the proposed approach to the risk assessment required for non-CMPA classification? Please explain your answer.

Question 4: Do you agree or disagree with the proposed process for non-CMPA classification we have outlined? Please explain your answer.

Continuing Airworthiness

Question 1: Do you agree or disagree with our proposed changes to Article 3 Continuing airworthiness requirements? Please explain your answer.

Question 2: Do you agree or disagree with our proposed changes to Annex I (Part M), including the changes to Appendix VII? Please explain your answer.

Question 3: Do you agree or disagree with our proposed changes to Annex Vb (Part ML)? Please explain your answer.

Question 4: Do you agree or disagree with our proposed changes to Annex Vd (Part CAO)?

Personnel Licensing

Question 1: Do you agree or disagree with the proposed changes to FCL.010 Definitions with reference to personnel licensing of new VTOL aircraft? Please explain your answer.

Question 2: Do you agree or disagree with the proposed changes to FCL.205.A PPL(A) - Privileges? Please explain your answer.

Question 3: Do you agree or disagree with the proposed changes to FCL.205.H PPL(H) - Privileges? Please explain your answer.

Question 4: We invite views on the proposed approach to FCL.305 CPL - Privileges and conditions and associated provisions? Please explain your answer.

Question 5: Do you agree or disagree with the proposed changes to FCL.505 ATPL - Privileges and associated provisions? Please explain your answer.

Question 6: Do you agree or disagree with the proposed changes to FCL.600 IR - General and FCL.610 IR - Prerequisites and crediting. Please explain your answer.

Question 7: Do you agree or disagree with the proposed approach to FCL.730A Specific requirements for pilots undertaking a zero flight time type rating (ZFTT) course - aeroplanes? Please explain your answer.

Question 8: Do you agree or disagree with the proposed approach to FCL.720H Experience requirements and prerequisites for the issue of type ratings - helicopters? Please explain your answer.

Question 9: Do you agree or disagree with the proposed approach to FCL.720PL Experience requirements and prerequisites for the issue of type ratings - Powered-Lift aircraft Please explain your answer.

Question 10: Do you agree or disagree with the proposed approach to FCL.725.PL Flight instruction for the issue of type ratings - Powered-Lift aircraft? Please explain your answer.

Question 11: Do you agree or disagree with the proposed changes to FCL.810 Night rating? Please explain your answer.

Question 12: We invite views on the proposed approach to Subpart J - Instructors? Please explain your answer.

Question 13: Do you agree or disagree with the proposed changes to Appendix 8 Cross-crediting of the IR part of a class or type rating proficiency check? Please explain your answer.

Question 14: We invite views on the proposed approach to Appendix 9 Training, skill test and proficiency check for MPL, ATPL, type and class ratings, and proficiency check for IRs? Please explain your answer.

Question 15: Do you agree or disagree with the proposed approach to Subpart ATO Specific requirements related to Approved Training Organisations (ATOs)? Please explain your answer.

Question 16: Do you agree or disagree with the proposed approach to amendments to The Air Navigation Order 2016? Please explain your answer

Flight Operations

Question 1: Do you agree or disagree with the proposal to require all operators of aircraft certified under SC-VTOL that are required to be equipped with a Flight Data Recorder to have a flight data monitoring programme? Please explain your answer.

Question 2: Do you agree or disagree with the proposal to include Powered-Lift in the use of operating sites equitably with helicopters? Please explain your answer.

Question 3: Do you agree or disagree with the proposal to update the Commercial Air Transport fuel schemes to equitably accommodate new and emerging aircraft types, energy sources and propulsion systems? Please explain your answer.

Question 4: Do you agree or disagree with the proposed introduction of a definition for “special recharging, discharging or battery swapping”, aligned with the existing concept of special refuelling, and with placing responsibility on the operator to manage the associated risks through a risk assessment, procedures, and personnel training? Please explain your answer.

Question 5: Do you agree that existing helicopter overwater requirements, suitably adapted where necessary, should form the baseline regulatory framework for Powered-Lift and electrically powered helicopter overwater operations? Please explain your answer.

Question 6: Do you agree or disagree with the proposed regulatory framework for Powered-Lift aircraft in Section 2B, including the application of aeroplane-based provisions where aircraft are capable of wing-borne take-off and/or landing? Please explain your answer.

Question 7: Do you agree or disagree that take-off and landing profiles for Powered-Lift should be developed by the Type Certificate holder and incorporated by operators, in line with ICAO Doc 10110? Please explain your answer.

Question 8: Do you agree or disagree with the proposal to adapt Annex IV Subpart D section 2 to equitably accommodate new propulsion systems and energy types and that this approach provides an appropriate and proportionate framework, while maintaining clear accountability with Type Certificate holders for any aircraft-specific requirements? Please explain your answer.

Question 9: Do you agree or disagree with the proposal to create a dedicated Powered-Lift section derived from existing aeroplane and helicopter requirements, including the approach to selecting or combining requirements where differences exist, and that this approach provides an appropriate and proportionate framework, while maintaining clear accountability with Type Certificate holders for any aircraft specific requirements? Please explain your answer.

Question 10: Do you agree or disagree that helicopters certified under SC-VTOL should be subject to the same Flight Data Recorder requirements as other types of helicopter of equivalent mass, with a mandatory lightweight flight recorder for those below the FDR threshold? Please explain your answer.

Question 11: Do you consider the proposed Flight Data Recorder and data-retention requirements for Powered-Lift aircraft to be appropriate, taking into account their unique design and operational profiles. Please explain your answer.

Question 12: Do you agree or disagree with the proposal that Powered-Lift aircraft should comply with all helicopter specific approval requirements for Performance-Based Navigation (PBN), including being subject to the helicopter approval requirements for the RNP 0.3 specification? Please explain your answer.

Question 13: Do you agree or disagree that helicopter NVIS regulations apply to helicopters certified under SC-VTOL and with the proposal to amend them to include Powered-Lift? Please explain your answer.

Question 14: Do you agree or disagree that Helicopter Hoist Operations regulations apply to helicopters certified under SC-VTOL and with the proposal to amend them to include Powered-Lift? Please explain your answer.

Question 15: Do you agree or disagree that Helicopter Emergency Medical Service regulations apply to helicopters certified under SC-VTOL and with the proposal to amend them to include Powered-Lift? Please explain your answer.

Question 16: Do you agree or disagree that Helicopter Offshore Operations regulations apply to helicopters certified under SC-VTOL and with the proposal to amend them to include Powered-Lift? Please explain your answer.

Question 17: Do you agree or disagree with the proposal to determine fuel or energy reserve requirements for Powered-Lift aircraft primarily on the intended landing mode, with final reserves aligned to helicopter or fixed-wing aeroplane requirements as appropriate? Please explain your answer.

Question 18: Do you agree or disagree with the proposal to adapt Annex VI Subpart D section 2 to equitably accommodate new propulsion systems and energy types and that this approach provides an appropriate and proportionate framework, while maintaining clear accountability with Type Certificate holders for any aircraft specific requirements? Please explain your answer.

Question 19: Do you agree or disagree with the proposal to create a dedicated Powered-Lift section derived from existing aeroplane and helicopter requirements, including the approach to selecting or combining requirements where differences exist and that this approach provides an appropriate and proportionate framework, while maintaining clear

accountability with Type Certificate holders for any aircraft-specific requirements? Please explain your answer.

Question 20: Do you agree or disagree with the proposal to adapt Annex VII Subpart D section 2 to equitably to accommodate new propulsion systems and energy types and that this approach provides an appropriate and proportionate framework, while maintaining clear accountability with Type Certificate holders for any aircraft specific requirements? Please explain your answer.

Question 21: Do you agree or disagree with the proposal to create a dedicated Powered-Lift section derived from existing aeroplane and helicopter requirements, including the approach to selecting or combining requirements where differences exist and that this approach provides an appropriate and proportionate framework, while maintaining clear accountability with Type Certificate holders for any aircraft-specific requirements? Please explain your answer.

Question 22: Do you agree or disagree with the proposal to adapt Annex VIII Subpart D section 2 to equitably accommodate new propulsion systems and energy types and that this approach provides an appropriate and proportionate framework, while maintaining clear accountability with Type Certificate holders for any aircraft specific requirements? Please explain your answer.

Question 23: Do you agree or disagree with the proposal to create a dedicated Powered-Lift section derived from existing aeroplane and helicopter requirements, including the approach to selecting or combining requirements where differences exist and that this approach provides an appropriate and proportionate framework, while maintaining clear accountability with Type Certificate holders for any aircraft-specific requirements? Please explain your answer.

Question 24: Do you agree or disagree with the position that no changes are necessary to the sections identified, on the basis that they are already sufficiently flexible to accommodate new and emerging aircraft types and propulsion systems?

If you do not agree, please specify the relevant section(s), describe the changes you consider necessary, and provide the rationale for your alternative view.

Question 25: Do you have any further concerns with the content of this consultation that have not been addressed through other questions?