

UK General Aviation opportunities after leaving EASA

Consultation Response Document

CAP 2146

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Summary: the CAA GA Change Programme for 2021/22

1. This document summarises the outcome of the CAA's consultation on UK General Aviation (GA) opportunities for change now that the UK has left the EASA system (CAP 1985¹).
2. The CAA wanted to understand:
 - how we could help the GA community (and its associated businesses and industries) flourish after leaving EASA;
 - the specific priorities of the GA community;
 - how we could engage with and work more efficiently, constructively and collaboratively with GA communities in delivering our objectives;
 - the priorities of those who are not part of the GA community when considering the future of GA in the UK.
3. We are very grateful for all the responses – nearly 1000 – that we received at the end of last year, and for the input we have had through engagement with the GA community and others. We have analysed the responses, and following clearance by the CAA Board and confirmation of funding by the Department for Transport, we have drawn up a GA Change Programme for 2021/22.
4. The following are explained in more detail in Chapters [3](#) and [4](#), but in summary, the programme is comprised of 46 initiatives:
 - **three strategic projects** – each being a project of relatively high complexity and high impact and expected to take more than 12 months from start to completion:
 - **Strategic Project 1:** the simplification and rationalisation² of GA flight crew licensing
 - **Strategic Project 2:** the simplification and rationalisation² of GA airworthiness maintenance regulations

We will work closely from the outset with the GA community, including the various GA associations, to ensure that we increase clarity and reduce complexity through a proposed simplified set of options for GA. We will then run a second consultation based upon these proposals before commencing any work

¹ CAP 1985 *UK General Aviation opportunities after leaving EASA – a consultation*, November 2020, www.caa.co.uk/cap1985 and <https://consultations.caa.co.uk/ga/uk-general-aviation-opportunities-after-easa/>.

² We explain what we mean by 'simplification and rationalisation' on page 26.

to implement them.

- **Strategic Project 3:** an exploration of GA medical requirements and benefits, including a review of the pilot medical declaration process in order to enhance the end user experience and to identify opportunities in the context of Strategic Project 1 above.
 - **15 tactical projects** – each being a project of relatively lower complexity than a strategic project, but still with either high or medium impact and expected to take between six and 12 months. A good example would be introducing an airworthiness equivalent of the very popular Skyway Code.
 - **16 ‘quick win’ activities** – not necessarily requiring its own project approach, each activity is of relatively low complexity and high or medium impact, and of up to six months duration. For example, creating a ‘myth-busting’ leaflet or quick-access guides to improve clarity and guidance on a range of topics where the CAA believes more information or greater clarity is needed.
 - **12 changes to ways of working** – not requiring its own project, but each will result in a change to some aspects of the way the CAA works. For example, appointing a CAA GA Unit member of staff who is also a practising GA pilot as a GA ‘just culture’ champion to work closely with the CAA’s airspace team.
5. As always, safety considerations are paramount. We are confident that our GA Change Programme for 2021/22 will bring benefits to the GA community while seeking to build on current levels of safety through a focus on education, the reduction of complexity and improved clarity of information and guidance.

Chapter 1

Overview

Purpose of this document

- 1.1 In November 2020, the CAA launched a six-week consultation seeking views on CAP 1985, *UK General Aviation opportunities after leaving EASA – a consultation*.³ This document summarises the responses we received and explains how we will use these to move forward.
- 1.2 The CAA wanted to understand:
- how we could help the GA community (and its associated businesses and industries) flourish after leaving EASA;
 - the specific priorities of the GA community;
 - how we could engage with and work more efficiently, constructively and collaboratively with GA communities in delivering our objectives;
 - the priorities of those who are not part of the GA community when considering the future of GA in the UK.
- 1.3 The consultation did not seek views on technical or operational concepts about how aircraft may fly, airspace design or areas outside the CAA's responsibility, such as VAT.

Background

- 1.4 The Secretary of State has set out his ambition for the UK to be the best place in the world for aviation at all levels to flourish, and for the CAA to build on the work of the General Aviation Unit to help to facilitate this. Our GA strategy⁴ complements and supports both government and our forthcoming wider CAA strategy by detailing our approach to supporting and championing GA in the UK.
- 1.5 The UK left the EASA system on 1 January 2021. The CAA made a commitment to the Secretary of State to undertake a 'Post-Brexit GA Challenge'. This will be one of the key mechanisms for enabling us to help the GA community overcome the challenges, take advantage of the opportunities and mitigate the impact of leaving EASA.

³ See www.caa.co.uk/cap1985 and <https://consultations.caa.co.uk/ga/uk-general-aviation-opportunities-after-easa/>.

⁴ CAP 1754 CAA General Aviation Strategy 2018-23 www.caa.co.uk/cap1754.

- 1.6 Having analysed the consultation responses, we have put together 46 initiatives into a GA Change Programme, commencing in April 2021.

Structure of this document

- 1.7 This document has an executive summary and four chapters:

- Chapter 1 is an overview that explains the purpose of this document and the background to the consultation.
- Chapter 2 summarises who responded to the consultation.
- Chapter 3 covers the opportunities for what we call the Post-Brexit GA Challenge; we summarise what you told us and how we intend to move forward in response.
- Chapter 4 covers the opportunities around engagement, efficiency and collaboration; we summarise what you told us and how we intend to move forward in response.
- Chapter 5 outlines next steps.

Working with the GA community on the Change Programme

- 1.8 As we embark on the Change Programme with the GA community it is worth highlighting some of the boundaries and constraints within which the programme must operate:

- ensuring that any change does not compromise safety standards
- resource and finance considerations that may dictate the pace of change, and the GA community's appetite for change
- where a change requires a change to secondary legislation such as the Air Navigation Order, it will be dependent on suitable space being found by the Department for Transport in the Government's wider legislative programme, which could extend implementation timelines
- constructive collaboration with the GA community.

- 1.9 We say more about this under 'next steps' in Chapter 5.

Chapter 2

The consultation and CAA analysis methodology

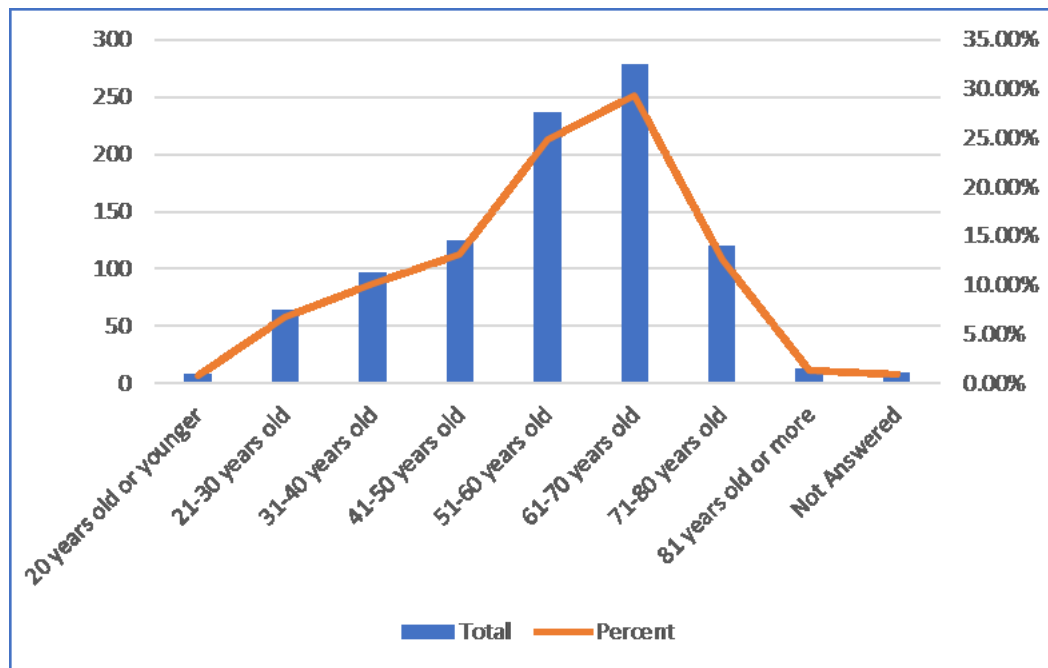
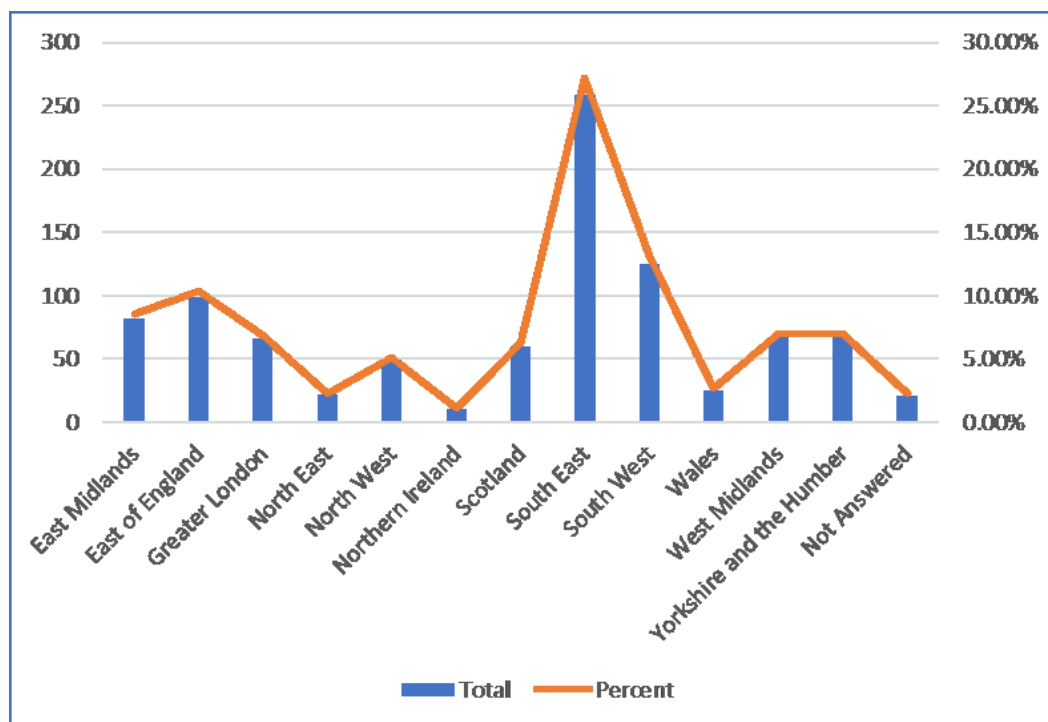
Engagement regarding the consultation

- 2.1 To encourage wide engagement, on the day of launching the consultation the CAA contacted approximately 14,000 subscribers – individuals and organisations – through a direct email and a further 8000 through the CAA's Skywise platform. Two weeks before the end of the six-week consultation period, we issued a reminder that the consultation would close on 18 December 2020. We also used posts on the CAA's LinkedIn (generating 33,000 views) and Twitter (generating 44,000 views) accounts. All these communications provided a link to the consultation on the CAA's website.
- 2.2 The Secretary of State for Transport, the Aviation Minister and the All-Party Parliamentary Group on General Aviation were all briefed. We also worked with the GA Partnership⁵ many months before the consultation was launched and throughout.

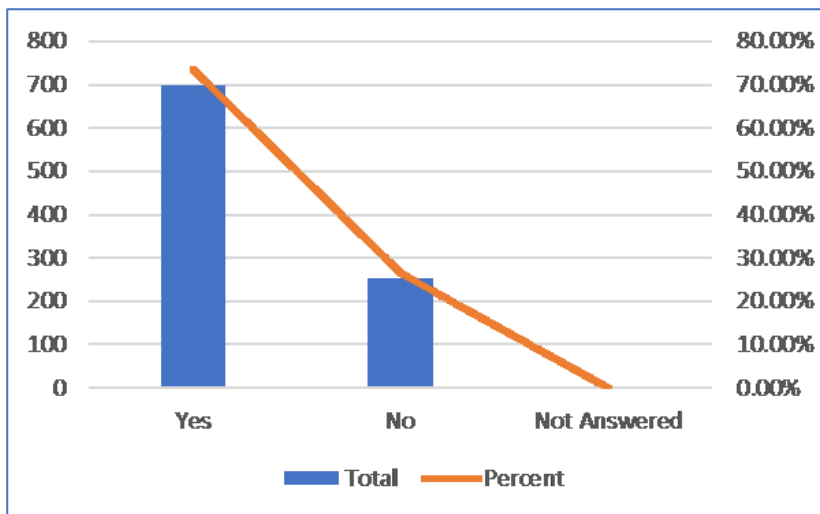
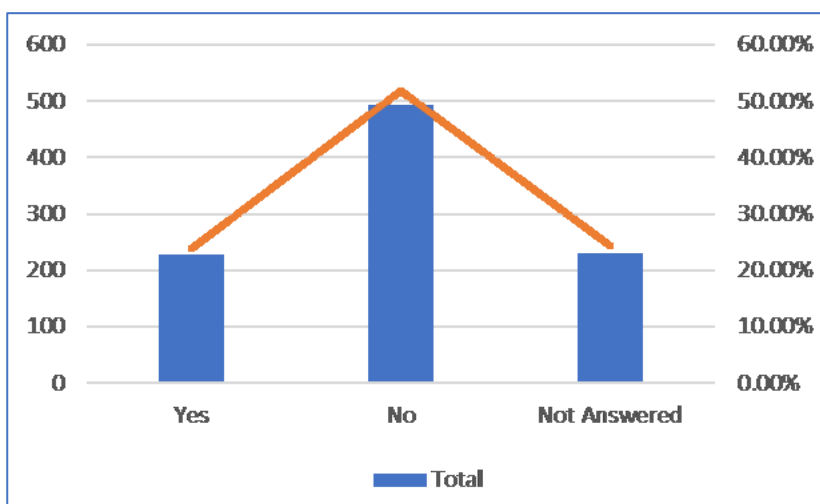
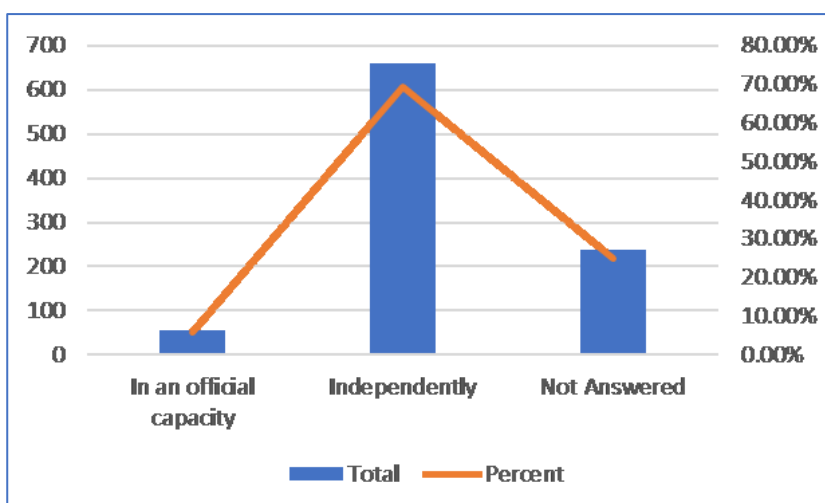
Who responded to the consultation

- 2.3 We received 952 responses through our online consultation platform. There were a further 18 responses via the GA Partnership to the first question about the top three priorities, some of which were on behalf of GA associations such as the BMAA, LAA and Flying Farmers Association. We also received four formal papers from the General Aviation Alliance, British Gliding Association, PPL/IR and (on the subject of flight crew licensing specifically) AOPA. Among the 952 responses there were 26 from those who described themselves as not part of the GA community.
- 2.4 All these submissions have been added to the data and taken into account in our analysis.
- 2.5 Figures 2.1 and 2.2 below show the age and geographic distribution respectively of the 952 on-line respondents. 68% of respondents were 51 years or older. Only 4% of respondents identified as female. Both these proportions are broadly in keeping with the data we have on UK-licensed private pilots. Just over one third of respondents were based in London or the South East, with a good spread of responses across the rest of the UK.

⁵ The GA Partnership is a focal point for communication between the GA community and the CAA. It plays an active role in all stages of the CAA's policy development including prioritisation of the CAA's GA Unit work programme. Membership includes more than 30 clubs associations and societies (see Appendix A).

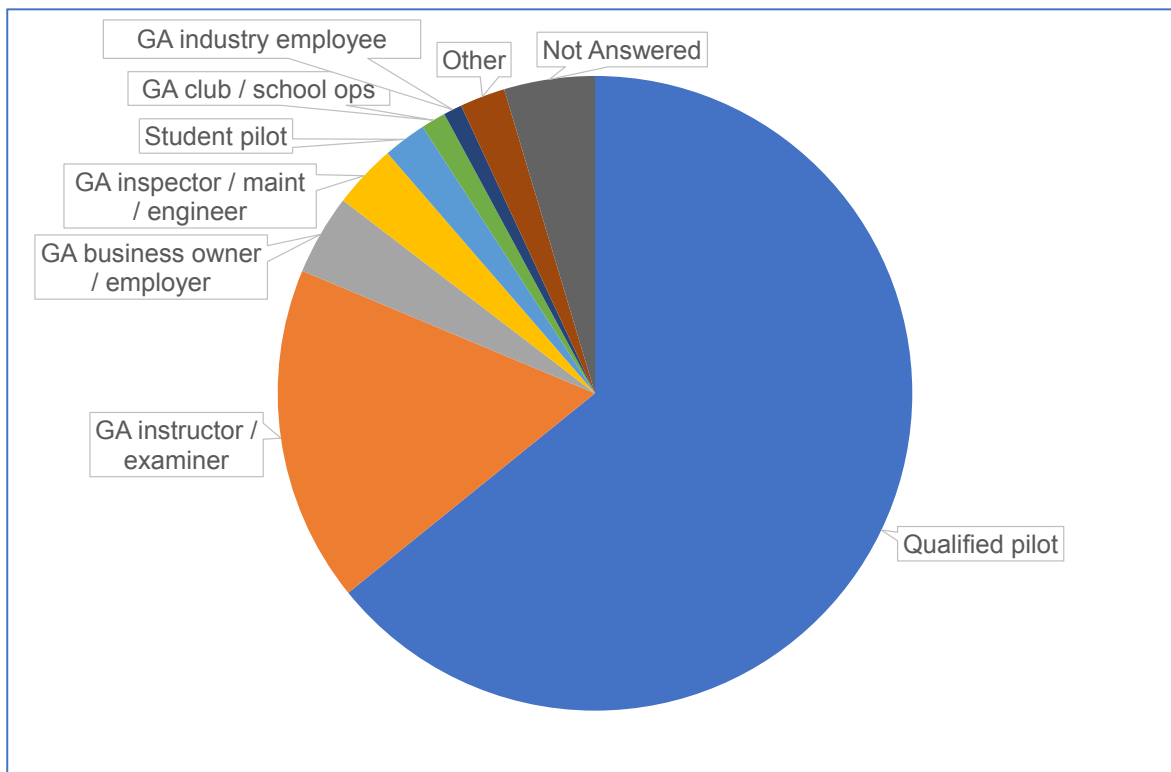
Figure 2.1 Age distribution of consultation participants**Figure 2.2 Geographic distribution of consultation participants**

2.6 Figures 2.3, 2.4 and 2.5 below show that nearly three-quarters of respondents were affiliated to an aviation organisation, but most were not responding on behalf of those organisations in an 'official' capacity, mostly being members of a flying club.

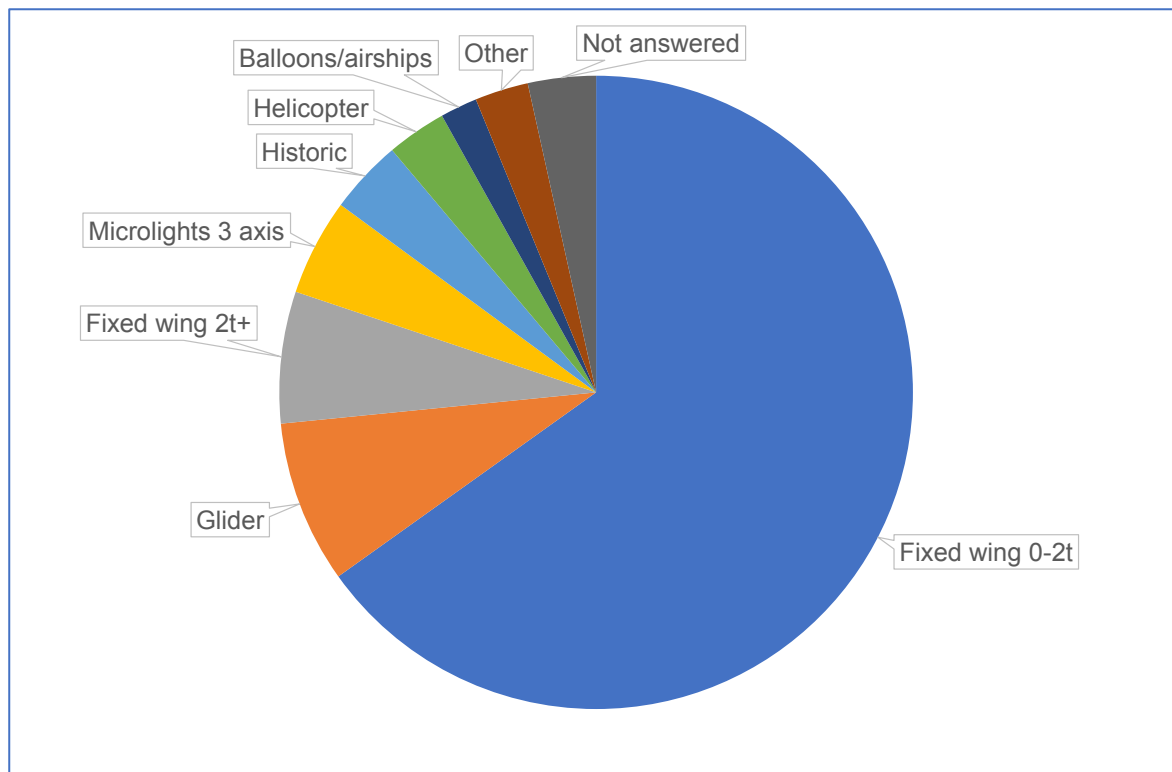
Figure 2.3 Affiliation with an aviation organisation, club or association**Figure 2.4 Affiliation in an official capacity****Figure 2.5 Response made in that official capacity or independently**

2.7 Figures 2.6 and 2.7 show how respondents categorised themselves in terms of their involvement in GA activities and the particular segment of GA of that involvement. The largest proportion of respondents described themselves as qualified pilots or flying instructors and examiners (GA activity) and flying fixed-wing aircraft below two tonnes MTOW.

Figure 2.6 How would you best describe your involvement in GA activities?



Category	Number	Percent
Qualified Pilot	611	64.2%
GA Flying Instructor / Examiner	163	17.1%
GA Business Owner and or Employer	39	4.1%
GA Aircraft Inspector / Maintainer / Engineer (Volunteer or Paid)	31	3.3%
Student Pilot	21	2.2%
GA Club or Flying School Operations	12	1.3%
GA Industry Employee	9	1.0%
GA Aircraft Builder (Volunteer or Paid)	5	0.5%
GA Manufacturing Employee	3	0.3%
GA Innovator or Designer	2	0.2%
GA Ground Instructor / Examiner	1	0.1%
Airfield Operations / Owner	7	0.7%
Air Traffic Controller	4	0.4%
Not Answered	44	4.6%
Total	952	100.0

Figure 2.7 What area of the GA community are you most involved with?

Option	Number	Percent
Balloons and/or Airships	18	1.9%
Fixed Wing 0-2 Tonne MTOW	620	65.1%
Fixed Wing 2+ Tonne MTOW	64	6.7%
Glider	79	8.3%
Hang Gliding, Paragliding or Paramotoring	6	0.6%
Helicopter	29	3.1%
Other Rotorcraft	4	0.4%
Historic Aircraft (including ex-military)	36	3.8%
Microlights Three Axis	47	4.9%
Microlights Flex Wing	5	0.5%
Model Aircraft Flyer	1	0.1%
Sub 70kg	2	0.2%
Skydiving	2	0.2%
Unmanned Aircraft Systems (Drones)	6	0.6%
Not Answered	33	3.5%
Total	952	100.0%

- 2.8 We had a lower-than-hoped return from engineers or those involved in airworthiness activities. Notwithstanding this fact there was still significant feedback on airworthiness and maintenance matters and we understand that many individuals may wear “multiple hats” within GA which will have skewed the results in figure 2.6.
- 2.9 As noted above there were 26 responses from those who described themselves as not part of the GA community. Six categorised themselves as local residents, five as retired members of the aviation community or military, two as commercial air transport (business aviation) and one was an air navigation service provider (an official response from NATS). The other 12 answered ‘other’ – most did not give us any more information, but those that did were kite flyers (including an official response from the British Kite Flying Association), members of the commercial manufacturing industry, or individuals looking to get into flying.

CAA analysis of responses

- 2.10 In order to develop the series of initiatives that ultimately make up our Change Programme, we analysed the quantitative and the qualitative information from the responses to the consultation. This process is summarised in Figure 2.8.

Figure 2.8 CAA analysis methodology

