

## **UK General Aviation opportunities after leaving EASA**

### **A Survey launched in Nov 2020**

#### **HAA Feedback**

##### **The CAA asked:**

As well as some demographic data, for research purposes, the CAA asked 10 questions to help better understand:

- How the CAA could help the GA community (and its associated businesses and industries) to flourish after leaving EASA, and to identify its specific priorities;
- How could the CAA engage with and work more efficiently, constructively and collaboratively with the GA communities in delivering their objectives;
- The priorities of those who are not part of the GA community when considering the future of General Aviation in the UK

Response from just under 1000 respondents including the HAA provided the CAA with nearly 15,000 data points. The top priority for change was to simplify and rationalise GA flight crew licensing.

The CAA analysed all data points and put together a GA Change Programme for 21/22 probably beyond which consists of 46 initiatives ranging from strategic projects to changes to the way that the CAA works. Full details have been published in the response document: [CAP2146 UK General Aviation opportunities after leaving EASA - Consultation Response Document](#)

#### **Overview**

The UK left the EASA on 1<sup>st</sup> January 2021, and the CAA made a commitment to the Secretary of State for Transport to undertake a "Post-Brexit GA Challenge". This challenge will be one of the key mechanisms for enabling the CAA to help the GA community overcome the challenges, take advantage of the opportunities and mitigate the impact that leaving EASA poses.

In addition, the aviation industry has been severely impacted by the COVID-19 pandemic which continues to have a profound effect across individuals, businesses, associations and the CAA. The CAA understands that GA communities do not have the same levels of resources as the commercial aviation sector and may feel under threat or have different appetite for change.

See [Consultation document - UK General Aviation opportunities after leaving EASA \(CAP 1985\)](#)

The HAA responded to the survey with the following answers to the questions posed in CAP1985:

Q. Would you be in favour of the CAA forming a new collaborative, diverse and inclusive 'GA Change Panel'? (as described in paragraph 2.6 of the consultation document)

HAA Answer - In favour

Q. When the CAA is looking at issues involving GA and developing or updating policy, do you think your views are currently available or properly represented to us?

HAA Answer - Sometimes

Q. How would you prefer your views to be made available and represented to us?

HAA Answer - Via an association or club

Q. Please provide reasons for your chosen answer:

HAA Answer - The Historic Aircraft Association has existed since 1979 to promote the safe flying of historic aircraft in the UK. That remit is as valid and important within the GA community today as it was then. The HAA mission is to support the restoration and preservation of historic aircraft; to achieve this the HAA works with the regulatory authorities to preserve a favourable climate of reasonable freedom to operate, restore and maintain historic aircraft with sensible regulatory control. The HAA provides a source of specialist advice to its members and other historic aircraft operators and promotes best practices for safe flying and maintenance of historic aircraft. The HAA believes that it offers an ideal platform and forum for the CAA to effectively engage with the sector of the GA industry in the UK that is involved with the preservation, continued operation and display of historic aircraft to the public, for our nation's best interests.

Q. How can the CAA be more diverse and inclusive in its outreach?

HAA Answer - Changing existing stakeholder forums.

Q. Please provide reasons for your chosen answer:

HAA Answer - Certain stakeholder forums have existed for a number of years and have developed into highly useful mechanisms for operator engagement with the CAA. These stakeholder forums have the ability for the industry to educate and positively influence the regulation of the CAA in these areas. One example of this is the ex-military aircraft airworthiness forums. The HAA believes that these stakeholder forums can be expanded in scope and depth to the benefit of both the GA

community and the CAA to build a richer, more diverse and inclusive engagement. Such engagement can produce more positive outcomes for the GA community in many areas, whether these be related to airworthiness, operations or licensing.

Q. The CAA wants it to be easier for users to find and understand the information needed. Please select the option that best describes your view of the information made available by the CAA.

HAA Answer - Not easily accessible or understandable.

### **HAA Priorities**

CAP1985 then asked about the HAA priorities and the following responses were provided.

Q. Please select your top priority to help UK GA thrive in a post EASA context, for the benefit of all. Please select which area of the GA sector it best fits into:

HAA Answer – Historic Aircraft

Q. Please select the type of opportunity as described in paragraph 2.5 of CAP1985

HAA Answer – Delegating where possible, practical and wanted.

Q. Describe your suggestion

HAA Answer – The HAA believes that it has a significant and important role to play in representing the pilots, operators and engineering organisations who keep the UK's aviation heritage and history alive. The HAA also believes that the CAA will be stretched significantly in the post-Brexit post-EASA era from 2021 onwards. The HAA believes that the CAA could and should work more closely with organisations (like the HAA) who represent specific sectors of the GA community and related industry. In working closely with such organisations, as key centres of experience and expertise, the outcomes for both the CAA and the GA sector would be significantly enhanced, without the need for the CAA to scale up (in terms of human resources and specialist knowledge.) The CAA should not try to be all 'things to all men' by itself. The HAA believes that working together the CAA and HAA would be stronger and better, for the ultimate benefit of everyone.

Q. What is your second priority to help UK GA thrive in a post EASA context for the benefit of all?

HAA Answer – Airworthiness and Maintenance

Q. Please select the type of opportunity as described in paragraph 2.5 of CAP1985

HAA Answer – Delegating where possible, practical and wanted.

### Q. Describe your suggestion

HAA Answer – One of the greatest challenges to the continued airworthiness, operation and ultimately access to the public (through air displays and static appearances) of the nation's historic aircraft, is the access to required spare parts both original and substitute. The current restrictions imposed by the CAA relating to continued airworthiness of historic aircraft largely prevent the use of modern equivalent or re-manufactured components and assemblies. The HAA believes that, in general, modern materials and technologies often surpass those of yesteryear and that an accepted (but closely controlled) regulatory environment whereby modern-equivalent parts could be used on historic aircraft, would enable and assure the continued airworthiness of many historic types. This would apply to piston and jet powered aircraft. This would contribute greatly to the ultimate benefit and education of the nation's general public.

### Q. What is your third priority to help UK GA thrive in a post EASA context for the benefit of all?

HAA Answer – Historic Aircraft

### Q. Please select the type of opportunity as described in paragraph 2.5 of CAP1985

HAA Answer – Offering more proportionate regulation

### Q. Describe your suggestion

HAA Answer – One of the areas that has seen significant growth and success in recent years has been the CAA's 'SSAC' dispensation. This permits historic and ex-military aircraft (non-CofA) to be operated in a commercial framework to enable members of the general public to enjoy flights (for reward) in these aircraft.

Currently the CAA has enabled single-engine piston powered aircraft to be operated in this way (e.g. Spitfires), in addition to (more recently) rotary and multi-engine types. However, the CAA has, to date, stopped short of enabling ex-military jet aircraft to be operated under the SSAC umbrella – (CAA SSAC Class 5). The HAA believes that the urgent expansion to also enable aircraft and operators of this class to offer flight experiences to members of the public (for financial consideration) is a natural and much-needed evolution of the existing and successful SSAC framework.

## **UK GA Community Questions**

### Q. Are there examples of GA regulation which you have experienced overseas which you think might also be beneficial within the UK?

HAA Answer – Yes. The 'Experimental' category of operation of 'non CofA' and historic aircraft in the USA has been highly successful, as has the Self-Administration Warbird category in Australia. The HAA believes that much learning from the US and Australia could be embraced by the CAA and incorporated into its regulation of a number of aircraft types in the

UK. In addition, within Europe, other member states currently permit what the CAA would refer to as SSAC Class 5. The HAA believes that it is long-overdue for the CAA to expand the scope of its SSAC programme to include Class 5 aircraft types and operators.

Q. In the current climate would you be in favour of change that may be disruptive or had costs associated with it initially, but enabled a longer-term benefit?

HAA Answer – In favour.

### **Why the CAA is consulting**

This consultation is an opportunity for the GA community to help achieve the CAA's ambition of making the UK the best place in the world for general aviation. Successfully delivering their objectives will only be possible if the CAA works collaboratively.

(See the CAA 3 objectives at first paragraph above.)

### **What happens next**

The views of the GA community will help shape both how the CAA works together with GA organisations like the HAA efficiently, constructively and collaboratively and will help guide the CAA's work on a Post Brexit GA challenge, helping form the priority projects for the 2021 GA Change Programme.

The CAA is to provide a consultation response summary document as soon as possible in 2021, and also intends to use the feedback received in updating the GA strategy in due course.

Contributor:

Oliver Wheeldon

HAA Management Committee

Operations Member

18<sup>th</sup> December 2020