

Affiliation with an organisation

Are you affiliated with this organisation in an official capacity?

Yes

Are you responding to this consultation in your official capacity on behalf of your organisation or independently of it?

In an official capacity

Please enter the name of the organisation that you are affiliated with

Please enter the name of the organisation that you are affiliated with:

British Gliding Association

Questions for all respondents

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)

In favour

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

Sometimes

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

Other

Please provide reasons for your chosen answer:

Change Panel:

The CAA should devise an effective process of policy development and engagement that involves stakeholder input and constructive challenge throughout – any such 'Change' or 'Challenge' panel must be a key element of this process. The panel will need to be sustained and have the support of the CAA board.

How enable gliding-specific views to be available/represented:

Wide stakeholder forums have significant limitations. For example, the needs of a gliding club, a UAS operator, a parachutist and a private helicopter or balloon operator differ enormously. Effective engagement needs to occur at a variety of levels, including individual, specific association/group (eg BGA/gliding) and wider stakeholder group (eg recreational GA).

Scope of GA:

The CAA/DfT's usual position on the scope of 'GA' being parachuting at one end and business jets and warbirds at the other results in representation and engagement challenges. We are pleased this consultation alludes to differences.

How can we be more diverse and inclusive in our out-reach?

Other

Please provide reasons for your chosen answer:

To reach all those the CAA regulates, there's a need to engage at individual, specific group and wider group levels.

Minimising those it needs to regulate and the amount of regulation needed will reduce the need for CAA outreach.

Finding the most effective communication tools across a broad range of preferences is a challenge. So yes to social media, but also email and other news media. When using different communication channels to different groups, ensuring the recipient understands the message is key and the content matter needs to be consistent.

We want it to be easier for you to find and understand the information you need. Please select the option that best describes your view of the information made available by the CAA.

Not easily accessible but is understandable

About you

Having fully read CAP 1985 - Please select whether you are responding to this consultation as either

a member of the UK GA Community

UK GA Community

How would you best describe your involvement in GA activities?(Please select one option)

GA Industry Employee

Other:

Flight instructor, airworthiness inspector, BGA senior employee and BGA accountable manager of various approvals

What area of the GA community are you most involved with? (Please select one category)

Glider

Other (please specify in a maximum of 20 words):

Gliding includes all sailplanes including powered sailplanes, which include TMGs, as well as aeroplanes used for towing sailplanes.

Which of the following social media websites do you currently have an account with? (Please select all that apply)

Facebook, Twitter, Instagram, LinkedIn

Other (please enter details below):

Do you know about the CAA's SkyWise alert system?

Yes

Do you subscribe to the CAA's SkyWise alert system?

Yes

Your priorities - Priority 1

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, from:

Licensing and Flying Training

Please select the type of opportunity from the following list. These are described in paragraph 2.5. of CAP 1985 as shown below

Delegating where possible, practical and wanted

Please describe your suggestion below (using a maximum of 250 words):

The BGA and its clubs deliver self-regulated sailplane pilot training which must comply with SFCL and DTO rules by October 21. Three actions are needed going forward under 'Licensing & training':

1. Delegate the oversight and support of SFCL and sailplane DTO activity to the BGA, including processing and issuing pilot licences.
2. SFCL and DTO rules are more complex than required by ICAO Annex 1. Organisation approval is unnecessary to teach someone to fly a sailplane. So work with BGA to develop revised UK SFCL and to delete UK DTO rules, AMC & GM that will in as short a timeframe as possible remove any existing unnecessary burdens whilst ensuring continued effective risk management and available compliance with ICAO for those who need that.
3. There is an urgent immediate need for a change in regulation to prevent disproportionate EASA medical requirements retained under UK law from damaging sporting and recreational aviation. The solution is to allow use in the UK of the CAA PMD by SPL, FI(S) and FE(S) holders, and SFCL student pilots.

Your priorities - Priority 2

Please select a second 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, from:

Airworthiness and Maintenance

Please select the type of opportunity from the following list. These are described in paragraph 2.5. of CAP 1985 as shown below

Offering more proportionate regulation

Please describe your suggestion below (using a maximum of 250 words):

The BGA and its clubs deliver Part21 compliant and non-Part21 airworthiness and maintenance.

Whilst most owners benefit from ICAO compliance, rules for Part21 aircraft are excessively burdensome. There is a need to ensure proportionality, and access to innovation and developments in airworthiness and maintenance.

In addition to the wider strategic vision described by the GA Alliance, we propose two actions;

1. Establish a process that can delegate authority (potentially but not necessarily through an A8-26 approval or a development of that process) to facilitate support for current and future innovation and regulatory developments around sailplane airworthiness and airworthiness maintenance personnel.
2. Work with BGA to develop revised Parts ML, CAO and 66 rules, AMC & GM that will remove any existing unnecessary burdens (for example 5-yearly renewal) whilst ensuring continued compliance with ICAO where that is required.

Your priorities - Priority 3

Please select your third 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, from:

Rules of the Air

Please select the type of opportunity from the following list. These are described in paragraph 2.5. of CAP 1985 as shown below

Offering more proportionate regulation

Please describe your suggestion below (using a maximum of 250 words):

1. There is a need to modernise VMC rules to eliminate, or at least raise, the height limit of the basic VMC definition "clear of cloud and in sight of the surface" as detailed in SERA.5001 VMC visibility and distance from cloud minima.
2. In addition, modernise VMC rules to include the basic VMC definition "clear of cloud and in sight of the surface" within class D and E+ conspicuity airspace below 7000'.
3. Review and remove unnecessary regulation that, for example limits use of radio (eg an operators licence to use a frequency for situational awareness at a gliding site or strip), or prevents non-certified GPS inputs to EC from being used to access airspace

UK GA Community

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

Yes

If you answered 'Yes', please describe the example(s) below, including the country involved and the benefit you believe it would bring to the UK:

France has adopted a process to allow student sailplane pilots to exercise limited privileges without supervision before they meet all the requirements that are necessary for the issue of an SPL.

The detail of the opportunity is described within the SFCL cover regulation Article 3a, paragraph 3. This change would significantly benefit UK gliding and align with successful precedent under pre-SFCL, ie BGA, requirements.

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?

In favour

Do you have any other suggestions on how the CAA could work more efficiently and collaboratively with the recreational GA communities?

Yes

If you answered 'Yes', please enter your suggestion(s) below:

Put in place a structure to review asap the need for dual GA regulation, eg for UK-Part 21 and non-Part 21 aircraft resulting a simpler, proportionate and risk-based approach to regulating recreational GA (see the GA Alliance response) that retains the benefits and removes the disbenefits of both of the current regulatory approaches. In doing so, review the need to regulate - the previous Red Tape Challenge achieved that for non-EASA (non-Part 21) regulation. Where there is a need to regulate, do so proportionately and maximise delegated authority.

Establish and maintain positive engagement.

Avoid surprises, particularly for those organisations responsible for GA activity.

Engage effectively and then consult effectively on changes.

Communicate promptly, accurately and effectively.

Ensure the wider CAA is 'on message' and committed to delivering on the Govt and CAAs stated aims and commitment towards proportionate and simpler GA regulation and delegation

Consent to publish

Do you consent to your responses to these questions being published?

Yes, with details