

CAP790 Consultation – Comment Response Document

Consultation Overview

The consultation on the proposed amendments to CAP790 closed on 8 May 2026. The CAA received 10 responses via Citizen Space from a combination of individuals and organisations involved in airside operations.

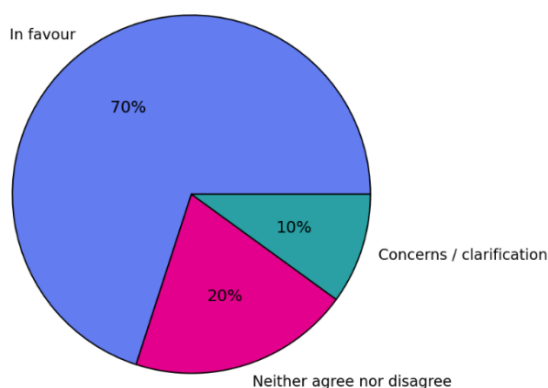
Summary of Responses

70% of respondents were in favour of the proposals

20% neither agreed nor disagreed

10% expressed concerns or requested clarification

Summary of Responses



Overall, respondents were supportive of the proposed changes, recognising the benefits in strengthening safety assurance and improving the consistency of airside driver training and competence.

General Themes from Responses

Common themes identified across responses included:

- Support for a risk-based and proportionate regulatory framework
- Requests for further clarity on
- Medical standards
- Language proficiency requirements
- Training record management
- Definitions and terminology
- Recognition of the need to balance
- Safety assurance

- Operational flexibility

Specific Topic – Medical Cannabis

You said;

A question was raised regarding the use of medical cannabis when driving airside.

CAA Response

Although the use of medical cannabis may, in limited circumstances, be permitted for driving on public roads, the airside environment is safety critical, and stricter standards apply. Individuals operating airside must be fit for duty at all times. The use of any drug, including prescribed medication, may impair performance. Accordingly, individuals must declare any medication that could affect performance, and employers must assess fitness for duty.

Many organisations operate zero-tolerance and testing policies; a positive test result may result in the withdrawal or suspension of an Airside Driving Permit (ADP).

CAA Consideration of Responses

The CAA has carefully reviewed all feedback received and is grateful to the 10 respondents who contributed to this consultation.

The consultation has provided valuable insight from stakeholders and has helped identify areas where clarification and refinement would improve the usability of CAP790.

Key Theme Identified

A strong theme across responses was the importance of maintaining a flexible, risk-based framework while improving clarity in implementation

Responses to Specific Questions

Safety Management and Accountability

You said;

Questions were raised regarding:

- Driving licence requirements on private land
- Medical requirements clarity
- Definition of minimum driving standards
- English language expectations

CAA Response

The requirements within CAP790 do not alter existing arrangements regarding driving on private land, do not prescribe detailed medical standards, which remain

outside scope. Require aerodrome operators to define minimum driving standards based on operational risk. It allows aerodrome operators to determine appropriate English language proficiency, proportionate to operational need.

Airside Vehicle Driver Authorisation

You said;

Comments focused on:

- Strength of guidance vs requirements
- Practical implementation of permits and training
- Monitoring of competence and licence validity

CAA Response

CAP790 Retains flexibility to allow aerodrome operators to tailor systems, requires competence to be demonstrated before issuing full permits. It Supports risk-based assurance, including supervised training, provisional or restricted authorisations and audit and sampling approaches.

Airside Drivers Medical Assessment

You said;

Comments raised regarding:

- Proportionality of requirements
- Lack of detailed medical standards
- Role of DVLA standards
- Medication disclosure
- Hearing/deafness considerations

CAA Response

The requirements in Chapter 3 are considered proportionate, when applied through a risk-based approach.

CAP790 aligns with DVLA standards as a baseline, allows aerodromes to define additional requirements where appropriate and places responsibility on employers and operators to assess fitness for duty.

Medication

Any medication (prescribed or over the counter) that may impair performance must be declared to the employer and assessed for safety impact.

Deafness / Hearing Capability

You said;

Hearing is not explicitly included in medical requirements, and clarification was sought on whether hearing assessments are required.

CAA Response

CAP790 does not mandate a specific hearing test; however, individuals must be able to communicate effectively and operate safely within the airside environment. The CAA has adopted a functional, risk-based approach, recognising that hearing thresholds alone do not determine operational capability.

Individuals with hearing impairment may perform safely using:

- Hearing aids or assistive devices
- Alternative communication methods

Safety outcomes depend on effective communication and situational awareness; accordingly, aerodrome operators must assess whether hearing capability is required for a given role and here relevant, this should be assessed through functional performance, including:

- Understanding instructions
- Use of radio communications (if applicable)
- Ability to detect warnings or alerts

Where hearing impairment is identified:

- A local risk assessment should be undertaken
- Reasonable mitigations should be considered
- Restrictions should only be applied where there is a clear impact on safety

This approach ensures safety is maintained, standards remain proportionate and unnecessary exclusion is avoided.

Training of Drivers on the Use of Vehicles

CAA Response

Training may be delivered as standalone or integrated programmes and must be proportionate to operational requirements.

When training is provided by a third-party providers, the training records should be provided to the aerodrome operator, they do not need to be submitted to CAA but should be made available on request. Assessors must be competent and authorised by the aerodrome operator.

Airside Driver Training Programmes

CAA Response

Training programme should be risk-based and proportionate. Content such as aircraft familiarity, lighting systems, emergency procedures should be tailored to operational risk.

Requirements for Training Programmes

CAA Response

CAP790 supports, competency-based approaches and remedial training following incidents (where appropriate). The level of training and reassessment should be determined locally, based on risk and operational complexity.

Language Proficiency

CAA Response

Language requirements apply primarily to roles requiring communication with ATS, It may be delivered through external providers. Aerodrome operators must maintain assurance processes and address language deficiencies where identified.

ADP Scheme

CAA Response

CAP790 allows flexibility in permit structures, requires competence to match operational risk.

Training Records

CAA Response

Training records must support traceability and assurance, they may be managed using audit and sampling approaches.

Further clarification will be considered regarding:

- Retention periods
- Responsibilities and ownership

Operating Vehicles Airside

CAA Response

CAP790 covers all airside vehicle operations, including aircraft towing, supports the use of communication aids and technology, where appropriate and should be aligned with local operational procedures.

Airside Driver Safety Checklist

CAA Response

The checklist provides guidance only, it should be adapted by aerodrome operators to reflect local risks.

The definition of “Safety Net” will be clarified in the final document.

Additional Topics for Future Consideration

The CAA acknowledges stakeholder suggestions relating to:

- Medical guidance
- Vehicle standards
- Document structure and naming

These will be considered as part of future CAP790 updates.

Clarity of CAP790

You said;

Further clarification is required in parts of the document.

CAA Response

The CAA acknowledges this feedback and will refine wording where necessary, improve clarity and consistency whilst maintaining a practical and proportionate framework. The CAA thanks all respondents for their engagement with this consultation.

Conclusion

Feedback has supported refinement of CAP790 to ensure it enhances safety, supports operational flexibility and provides clearer expectations for stakeholders. The CAA will now proceed with publication of the updated CAP790 considering the comments made by responders.

In light of the feedback received, the CAA intends to proceed with the proposed amendments to CAP790 introduce targeted clarifications to improve consistency of interpretation and maintain a proportionate, risk-based approach.