UK Civil Aviation Authority

Engagement Response Document

Call for Information on Future Air Traffic Services Rulemaking

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Executive summary

Between January and March 2026, the Civil Aviation Authority (CAA) ran a ‘Call for Information on Future Air Traffic Services (ATS) Rulemaking’ to gather stakeholder views on the principles that will shape future ATS rules. This work is important because the current ATS regulatory framework is split across multiple legislative sources which creates complexity. Forthcoming legislation may give the CAA greater powers to develop aviation safety rules through a more streamlined and responsive rulemaking process.

This document summarises stakeholders’ responses to the questions asked in the Call for Information, provides the CAA’s reflections on those responses and outlines how stakeholder feedback will inform the next stages of our work.

A key theme in stakeholders’ responses was the scale of the change posed by changing the format of the ATS ‘ruleset’ and the resources necessary to implement that change. Modernising the regulatory framework for ATS is a significant and complex programme that will take time to complete. Working with industry representatives provides us with the ability to develop the new ruleset and the materials necessary to support its implementation, whilst being mindful of the sector’s capacity to realise the change.

The CAA’s priority following the publication of this document is to establish our ‘Part-ATS Sub-Group’ and for it to have started its work by March 2027. We will aim to keep you updated on the sub-group’s activities as we make progress towards a consultation on our rulemaking proposals before March 2028.

Chapter 1
Introduction

Background

1.1 The Civil Aviation Authority (CAA) is beginning a package of work that will result in widespread changes to the structure and format of the 'ruleset' used in air traffic services (ATS). Our objectives in undertaking this work are to clarify the requirements placed upon ATS providers and to simplify the ruleset through the development of a comprehensive and coherent regulatory environment.

1.2 To that end, between 7 January and 4 March 2026, the CAA ran a 'Call for Information on Future Air Traffic Services Rulemaking'. Its purpose was to outline the founding principles that will inform the development of the future ruleset for ATS and to ask for your views on key aspects of our work.

1.3 The CAA would like to extend its sincere thanks to everyone who took the time to respond to our Call for Information. We know that developing these responses takes time and we are grateful for the information and perspectives that you shared.

Structure of this document

1.4 Chapter 2 of this document presents a summary of the key themes in the responses we received to each of the questions in the Call for Information. 63% of respondents wished for their response to be anonymised or not to be published. Accordingly, the CAA decided that it would be best to summarise the intent and key themes from the responses we received and not publish any of the individual responses.

1.5 Chapter 3 presents the CAA's thoughts on the key themes highlighted in your responses[1].

1.6 Chapter 4 describes the next steps that the CAA will take and how we intend to use your feedback to inform our work.

Why is this work important?

1.7 The UK's regulatory framework for ATS is split between requirements developed by the CAA under the Air Navigation Order and assimilated legislation originating from when the UK was a member of the European Union. The CAA considers that the existence of parallel legislative frameworks in the ATS domain increases

[1] Because we were unable to publish individual responses, we have been unable to provide individual feedback

the complexity of the framework and makes it more difficult to understand the regulatory landscape. The Department for Transport's (DfT) view is that the legislative framework for aviation safety rules (of which ATS is one part) is fragmented, complex and cumbersome. Providing a clear, accessible and comprehensive ruleset is critical to maintaining high levels of safety in the UK's airspace.

1.8 The CAA is supporting the DfT as the Civil Aviation (Consumer Protection and Regulatory Reform) Bill goes through Parliament. One of the purposes of that Bill is to confer power on the CAA to make aviation safety rules, using a simpler and more responsive rulemaking process[2]. Subject to the Bill receiving Royal Assent, the CAA will be able to work to address the challenges outlined above, although, this will be a significant and complex programme of change which will take time to complete. Irrespective of the form of the future legislative framework, the CAA believes that it is necessary to begin work now to modernise the ATS ruleset to improve its structure and useability, ensuring that it is well positioned to accommodate any possible future changes to the wider framework.

[2] Explanatory notes to the Civil Aviation (Consumer Protection and Regulatory Reform) Bill page 9.

Chapter 2

‘We asked’ and ‘you said’

Introduction

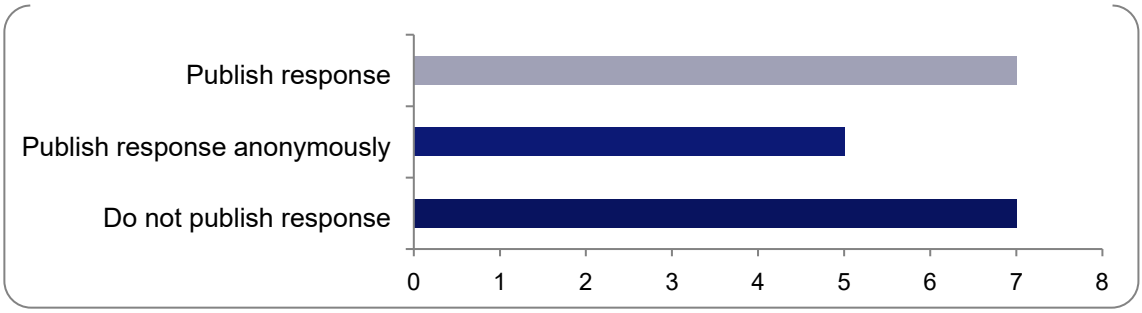
The content in this chapter presents the questions asked by the CAA in our Call for Information activity, followed by a summary of the key themes raised in the responses we received to those questions. Each of the questions appears under the heading ‘We asked’, followed by our summary of the key themes presented under the heading ‘You said’.

Call for information questions

We asked

Please indicate if you wish your response to be published anonymously, otherwise your name and organisation will be published alongside your response.

You said

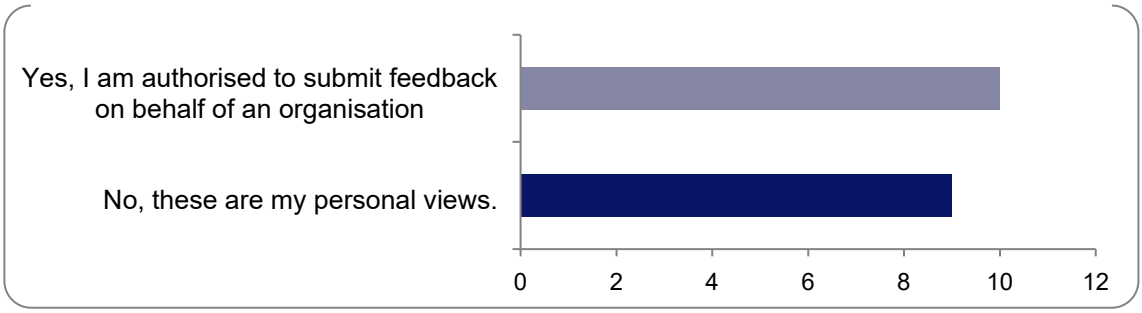


Option	Total	Percent
Publish response	7	36.84%
Publish response anonymously	5	26.32%
Do not publish response	7	36.84%
Not answered	0	0.00%

We asked

Do your views officially represent those of an organisation?

You said

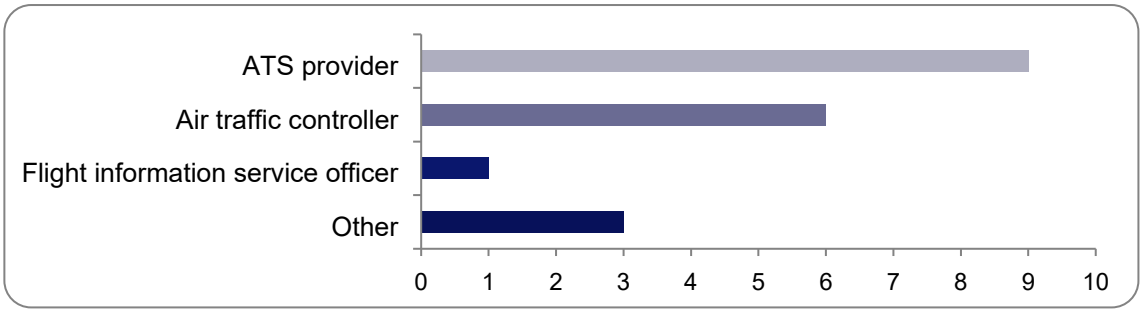


Option	Total	Percent
Yes, I am authorised to submit feedback on behalf of an organisation	10	52.63%
No, these are my personal views.	9	47.37%
Not Answered	0	0.00%

We asked

Which of the following best describes the group you represent?

You said

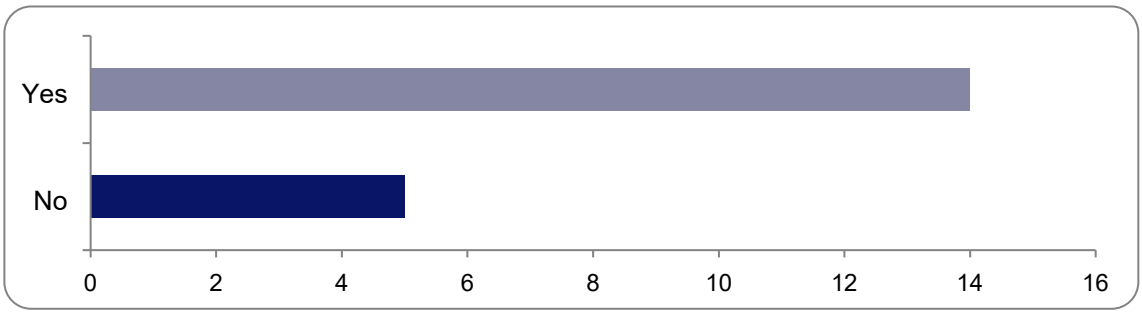


Option	Total	Percent
ATS provider	9	47.37%
Air traffic controller	6	31.58%
Flight information service officer	1	5.26%
Other	3	15.79%
Not Answered	0	0.00%

We asked

Do you agree with the proposed membership of the sub-group?

You said



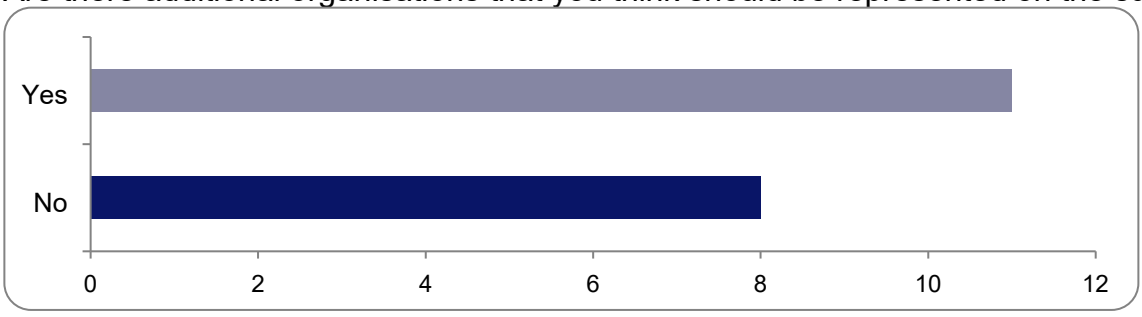
Option	Total	Percent
Yes	14	73.68%
No	5	26.32%
Not Answered	0	0.00%

Where respondents answered 'no', their rationale was founded upon:

- A desire from aircraft operator respondents for them to be represented on the subgroup.
- A need to understand the role of the Airspace & Air Traffic Services Working Group (AATS) from AirportsUK and the Guild of Air Traffic Controllers (GATCO) who will be invited to represent stakeholders on the sub-group.

We asked

Are there additional organisations that you think should be represented on the sub-group?



Option	Total	Percent
Yes	11	57.89%
No	8	42.11%
Not answered	0	0.00%

You said

In addition to the points made above regarding aircraft operators, AATS of AirportsUK and GATCO, the following emerged from stakeholder responses:

- The applicability of the revised regulatory framework to the Crown Dependencies and Overseas Territories.
- A desire for Global ATS Ltd alongside all UK air navigation service providers (ANSPs) and the CAA's own ATS Operations Inspectors to be represented on the sub-group.

We asked

If the ATS ruleset changed to consistently use the format seen in assimilated law (i.e. rule, AMC and GM), how would that change impact you?

You said

Many ANSP stakeholders described positive impacts associated with the clarity that a revised format of the ATS ruleset would bring, balancing these by highlighting the resource implications associated with the development of a more detailed unit operations manual. One respondent was concerned that the removal of the MATS Part 1 (CAP 493) and the FISO Manual (CAP 797) could lead to the inconsistent interpretation of the new ruleset by ANSPs when developing their unit operations manuals, in-turn risking divergence in the standard of provision of air traffic services.

One aircraft operator highlighted their concern that, if the CAA no longer published a document in the narrative style of the MATS Part 1, their ability to replicate the role of an air traffic controller in a flight simulator could be affected.

We asked

If the ATS ruleset changed in the way described, what challenges might be faced in developing and maintaining an operations manual that details the instructions and information required by a unit's operational personnel to perform their duties?

You said

While some stakeholders identified opportunities posed by the development of the unit operations manual (for example, a single reference document for operational personnel and the ability to tailor procedures to local needs), three themes emerged regarding its challenges:

- The size and complexity of the unit operations manual may reduce its useability, and personnel would require familiarisation training with the revised ruleset.
- Additional workload on ANSPs and the CAA in developing and maintaining unit operations manuals.

- Local interpretation in a unit operations manual could lead to inconsistent procedures across ATS units, risking divergence in the standard of provision of air traffic services.

We asked

What challenges might be faced if a unit operations manual were used as the sole means of providing the instructions and information required by a unit's operational personnel to perform their duties?

You said

In responding to this question, while stakeholders identified opportunities (for example, the ability to tailor procedures to local needs and the benefits of adopting electronic documents), the same three themes emerged regarding its challenges:

- The size and complexity of the unit operations manual may reduce its useability, and personnel would require familiarisation training with the revised ruleset.
- Additional workload on ANSPs and the CAA in developing and maintaining unit operations manuals.
- Local interpretation in a unit operations manual could lead to inconsistent procedures across ATS units, risking divergence in the standard of provision of air traffic services.

We asked

What do you think are the 'pros and cons' of the proposal to develop an unofficial 'Manual of ATS for the use of individual ATCOs and FISOs? The Manual would only address the operational provision of ATS, and would draw together only the technical requirements, AMC and GM published by the CAA.

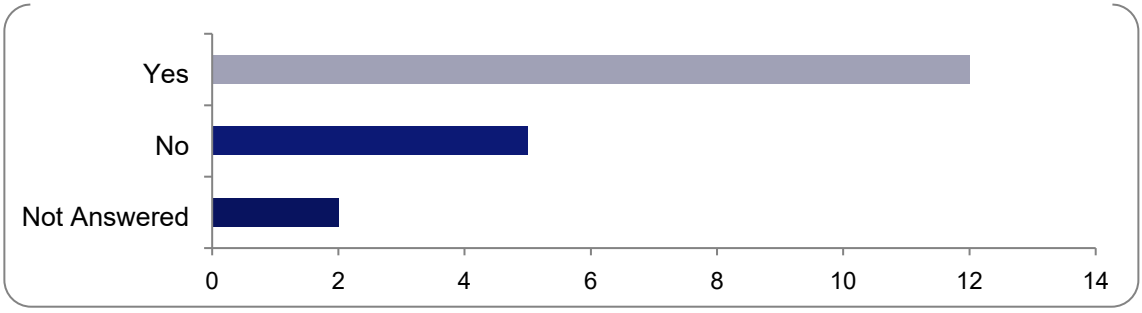
You said

Stakeholders supported the goal of making ATS requirements more accessible and understandable. While some believed that an 'unofficial' Manual of ATS might be of benefit to ab-initio ATCOs and FISOs, most considered that it was unnecessary, that it offered little value to unit personnel and that it could create confusion. One stakeholder proposed the development of a template for a unit operations manual, sections of which could be customised by each ATS unit to reflect their operations.

We asked

Does your unit's MATS Part 2 or Flight Information Service Manual detail any operational procedures that differ from those described within the MATS Part 1 or the FISO Manual? If yes, can you provide an estimate of how many differences there are?

You said



Option	Total	Percent
Yes	12	63.16%
No	5	26.32%
Not answered	2	10.53%

We asked

Based on the description of the scope and objective of the project, are you aware of any obstacles to meeting the indicative timelines?

You said

Stakeholders highlighted the resource implications for industry and the CAA associated with the development of detailed unit operations manual, with one stakeholder noting the additional impact of other change programmes (for example, the Airspace Modernisation Strategy) and the need to consider the overall change burden. Some stakeholder comments suggested that the proposal had been interpreted as indicating that the CAA intended to implement the revised ruleset by Q4 2028.

We asked

What are your initial thoughts on the CAA's proposed approach to Rules of the Air rulemaking?

You said

Most respondents welcomed the proposal, believing that it could streamline the ruleset and reduce what they perceive as legacy complexity and administrative burden within the current framework.

Comments from some respondents related to aspects of ATS rulemaking outside the scope of the Rules of the Air project (for example, a suggestion to develop templates to improve consistency in proposing changes to the functional system), while a small number of responses appeared to interpret the proposal differently from its intended meaning.

We asked

Based on what you have read in the 'Call for Information on Future Air Traffic Services Rulemaking' document, is there any other feedback that you wish to provide?

You said

Some stakeholders recognised that the current regulatory environment had become increasingly complex, acknowledging that a more coherent and streamlined framework could be beneficial. There was support for reducing unnecessary divergence from ICAO, improving clarity, and establishing a ruleset that is easier to understand and maintain. However, many respondents felt there was insufficient detail to fully assess the impact of the proposals.

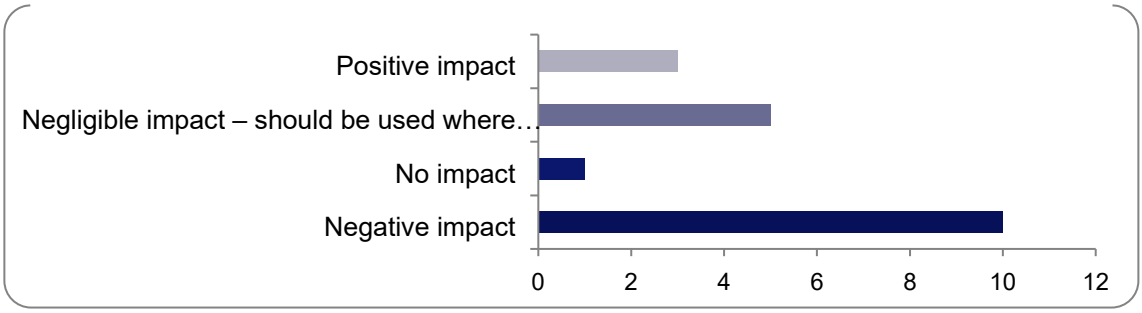
Recurring themes in stakeholder comments were the:

- resource implications associated with the development of detailed unit operations manual; and
- risk of divergence in the standard of provision of air traffic services, caused by inconsistent interpretation of the new ruleset by ANSPs when developing their unit operations manuals.

We asked

What impact might the proposal have on safety?

You said



Option	Total	Percent
Positive impact	3	15.79%
Negligible impact – should be used where there is an impact, either positive or negative, but where its' impact is considered too small to be worth taking into account	5	26.32%
No impact	1	5.26%
Negative impact	10	52.63%
Not answered	0	0.00%

Where stakeholders considered that a positive impact would result, they attributed this to the effects arising from simplifying the ruleset.

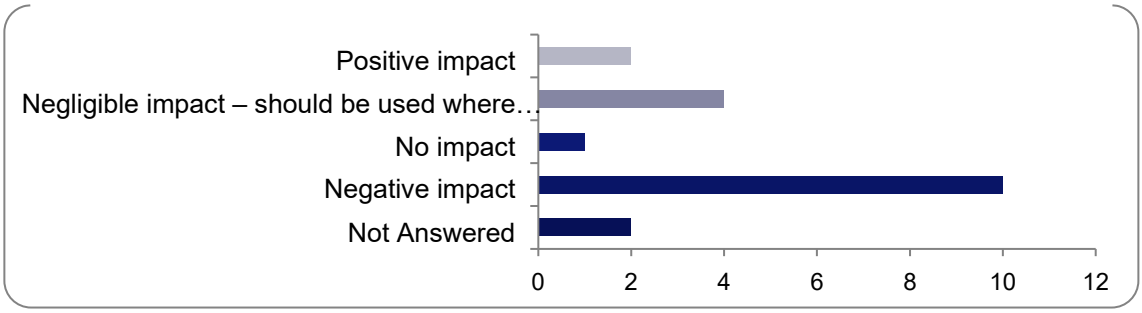
Where stakeholders considered that the proposal would have a negligible impact, this reflected a balance between the positive impact associated with simplifying the ruleset and the potential negative impact arising from concerns that unit operations manuals could lead to divergence in the standard of provision of air traffic services.

Where stakeholders considered that the proposal would have a negative impact, this was primarily attributed to concerns that unit operations manuals could lead to divergence in the standard of provision of air traffic services.

We asked

What impact might the proposal have on the efficiency of the ATM system, either locally or nationally?

You said



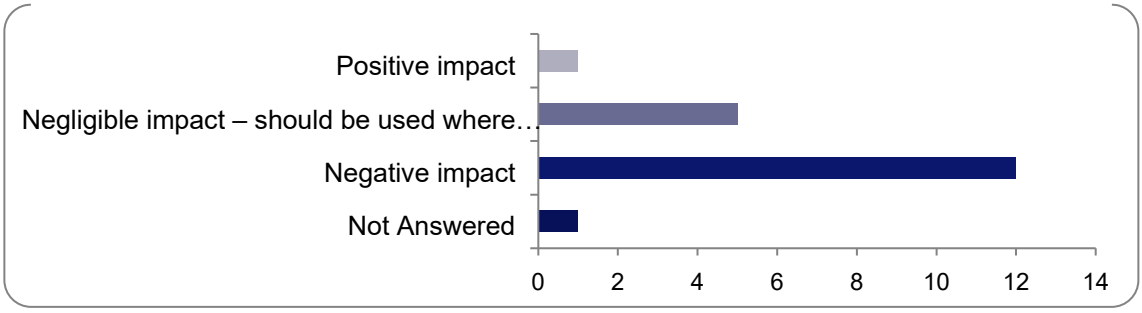
Option	Total	Percent
Positive impact	2	10.53%
Negligible impact – should be used where there is an impact, either positive or negative, but where its' impact is considered too small to be worth taking into account	4	21.05%
No impact	1	5.26%
Negative impact	10	52.63%
Not answered	2	10.53%

Stakeholders identified positive impacts on efficiency in the long-term, once the revised ruleset has been implemented and entered a 'steady state' operation. However, stakeholders expressed concern about the negative impact on efficiency in the near-term, citing concern over the resources necessary to develop detailed unit operations manual. Those stakeholders who believe that the proposals would have a negligible impact explained that it was based on a balance of both positive and negative impacts.

We asked

What financial impact might the proposal have? Will implementation have a financial cost?

You said



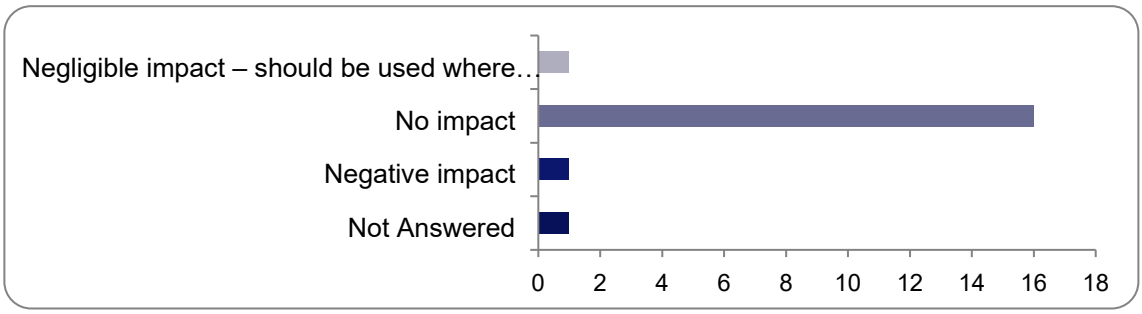
Option	Total	Percent
Positive impact	1	5.26%
Negligible impact – should be used where there is an impact, either positive or negative, but where its' impact is considered too small to be worth taking into account	5	26.32%
No impact	0	0.00%
Negative impact	12	63.16%
Not answered	1	5.26%

Where supporting comments were included, they referred to the cost of the resources associated with the development of unit operations manuals.

We asked

What impact might the proposal have on aviation security?

You said



Option	Total	Percent
Positive impact	0	0.00%

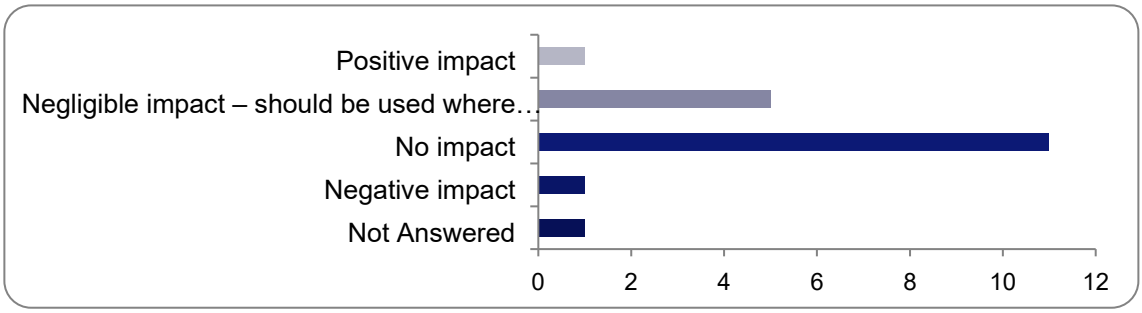
Negligible impact – should be used where there is an impact, either positive or negative, but where its’ impact is considered too small to be worth taking into account	1	5.26%
No impact	16	84.21%
Negative impact	1	5.26%
Not answered	1	5.26%

There were no additional textual responses to this question.

We asked

What impact might the proposal have on the environment; for example, through increased fuel burn, increased CO2 emissions?

You said



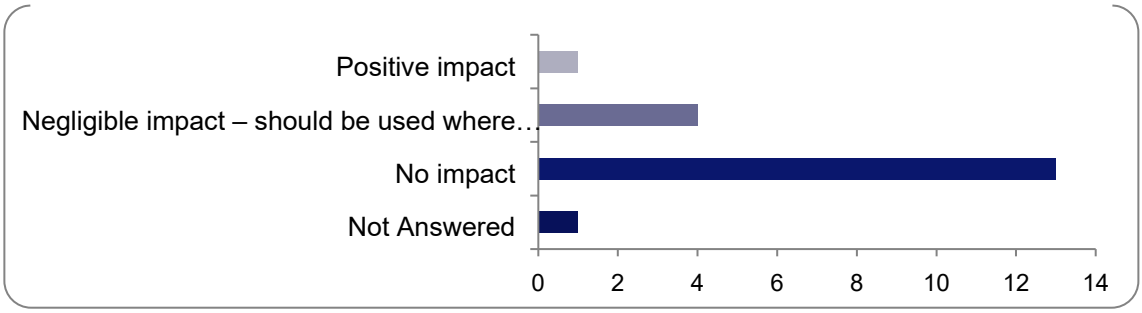
Option	Total	Percent
Positive impact	1	5.26%
Negligible impact – should be used where there is an impact, either positive or negative, but where its’ impact is considered too small to be worth taking into account	5	26.32%
No impact	11	57.89%
Negative impact	1	5.26%
Not answered	1	5.26%

One respondent considered that the proposals would negatively impact the environment because a flight could be delayed if issues previously addressed in the MATS Part 1 were not included in the unit operations manual.

We asked

Do you consider that this proposal may disadvantage people who are protected under the Equality Act 2010?

You said



Option	Total	Percent
Positive impact	1	5.26%
Negligible impact – should be used where there is an impact, either positive or negative, but where its' impact is considered too small to be worth taking into account	4	21.05%
No impact	13	68.42%
Negative impact	0	0.00%
Not answered	1	5.26%

Two stakeholders questioned whether the revised format of the ruleset might impact neurodiverse individuals or those with learning difficulties such as dyslexia.

Chapter 3

CAA's thoughts on the key themes

Initial proposals

3.1 Through our Call for Information, we sought feedback on specific aspects of our work to modernise the ruleset for the ATS domain, and invited stakeholders to describe the impacts that they felt the proposals could have on six specific areas: safety, efficiency, financial, security, environmental and equality.

3.2 Having undertaken a thematic analysis of stakeholder responses, the CAA has grouped its thoughts on your feedback into the following categories:

- Participation in the sub-group.
- Revised format for the ruleset and the development and use of a unit operations manual.
- The timeline for transition and implementation.
- The cost of transition and implementation.
- Rules of the Air rulemaking.
- Equality Act 2010.

Participation in the sub-group

3.3 The objective of the sub-group is to transpose the existing content of the MATS Part 1 and the FISO Manual into the new format of the ruleset. At this stage, the CAA does not anticipate that changes will need to be made to operational procedures which would affect the way that ATS are provided. Accordingly, the membership of the sub-group will focus on those stakeholders primarily affected by the work on the new ruleset, rather than extending to aircraft operator representatives. However, it is worth noting that several individuals participating in the sub-group also hold private and professional pilot's licences. If the subgroup perceives that a change to operational procedures is necessary, they will need to develop a change request for consideration by the new ATS Procedure Development Working Group (ATSPDWG). The membership of the ATSPDWG will include representatives from aircraft operators (further details on the ATSPDWG will be published in the coming months) and the CAA will widely consult with interested parties prior to any change to operational procedures.

3.4 As regards ANSP participation in the sub-group, as long-standing members of the CAA's ATC Procedures Working Group[3], representatives from Global ATS Ltd and Air Navigation Solutions Ltd (ANSL) will be invited to participate in the sub-group alongside the CAA's ATS Operations team. Two other stakeholders who will be invited to participate in the sub-group are the Airspace & Air Traffic Services Working Group (AATS) of AirportsUK and the Guild of Air Traffic Control Officers (GATCO).

- The AATS is a dedicated committee that seeks to facilitate industry collaboration on a range of topics including: the regulatory landscape of air traffic services, airspace modernisation and the integration of new technologies for new airspace users.
- GATCO is the professional body representing the professional interests and opinions of those in the UK working within air traffic management, including flight information service officers.

3.5 The participants in the sub-group will be representative of the breadth of the UK's air traffic services industry. To ensure that the sub-group remains of a manageable size and able to work effectively, it will not be possible for every UK ANSP to participate directly. The proposed membership is intended to provide a representative range of operational perspectives, supplemented by wider consultation before changes are made to the format and structure of the ruleset.

3.6 We recognise that some of the Crown Dependencies and Overseas Territories may have an interest in the work, particularly where they adopt or follow UK regulatory requirements. Where such interest is expressed, the CAA will use existing coordination arrangements to share information and engage as appropriate, rather than through their membership of the sub-group.

Revised format for the ruleset and unit operations manuals

3.7 The CAA acknowledges the scale of the change that we all face in adopting the revised format of the ruleset. We highlighted in the 'Call for Information' that we had considered the effect on individual air traffic controllers (ATCOs) and flight information service officers (FISOs), and that we envisaged the need for a transition period and the development of guidance material to support industry. Our intent for the sub-group is not only that it informs the development of the new ruleset, but that it supports us in these other tasks as we work together towards implementation.

3.8 In terms of the development of the ruleset, it will be formed by taking existing content from the MATS Part 1, the FISO Manual and ATS Safety Requirements and placing it alongside provisions currently contained in the Standardised

[3] Which will be subsumed within the new ATSPDWG.

European Rules of the Air (SERA) and Annex IV Part-ATS to UK Reg (EU) 2017/373[4]. As a rule of thumb, content relating to the operational provision of ATS which is included in the MATS Part 1 or the FISO Manual today, will be retained in the revised ruleset.

3.9 In terms of the size and complexity of a unit operations manual, it is likely that, for many units, the new manual will have less content than the combination of, for example, the existing MATS Part 1 and a unit's MATS Part 2. The unit's operations manuals will only need to include content that is relevant to that unit and its provision of ATS. Moreover, the content would continue to reflect the unit's existing procedures for the provision of services; whether that content is currently contained in a document published by the CAA or in local instructions. The CAA anticipates that training to familiarise staff with the new unit operations manual will be required. The nature and scale of that training will be considered by the sub-group as the revised ruleset is developed, taking account of the potential resource implications identified by respondents.

3.10 It is important to stress that unit operations manuals will not be able to cater for every eventuality. This is the same for the MATS Part 1 which emphasises that nothing prevents a controller from using their own discretion and initiative in responding to unusual circumstances which may not be covered by the procedures contained therein. This flexibility will be retained in unit operations manuals in the future, not least because it is related to a fundamental principle of our common law.

3.11 The CAA believes that a template for a unit operations manual is a viable means to reduce the workload of ANSPs in developing and maintaining those manuals. For example, much of the content of Section 1 of both the MATS Part 1 and the FISO Manual will be common to all ATS units and could be placed within the template.

3.12 On the issue of divergence, the challenge in the future is little different from that faced today. The contents of the MATS Part 1 and FISO Manual are based upon provisions developed by the International Civil Aviation Organisation (ICAO) which are taught to (and applied by) ATCOs and FISOs and, where necessary, amplified and interpreted in local instructions. Standardisation is achieved through a variety of means but, primarily, by instructors, competency assessors and the CAA's ATM oversight team. The key difference in the future is that the content produced by the CAA will be presented in a different format.

3.13 As regards support to flight simulation, the CAA notes that the MATS Part 1 and the FISO Manual are published for the use of civil ATCOs and FISOs. Whilst we

[4] For an example of how the format of the revised ruleset may appear, see Annex IV Part-ATS of EASA's easy access rules version of Regulation (EU) 2017/373.

acknowledge that these documents may be of general interest to others associated with civil aviation, they are not intended to be used by individuals who seek to replicate the provision of air traffic services and who are not themselves ATCOs or FISOs. The CAA's role in this regard is to create a ruleset for the use of ANSPs.

Timeline for transition and implementation

3.14 The CAA's work on the ATS ruleset sits within the wider context of our work with the DfT on the future development of the aviation safety regulatory framework. This is a significant and complex programme of change which will take time to complete. However, until the Civil Aviation (Consumer Protection and Regulatory Reform) Bill receives Royal Assent and the future legislative framework is confirmed, there is insufficient certainty to provide a meaningful timeline for that work. In the meantime, we can begin work to modernise the ATS ruleset, improving its structure and useability and ensuring that it is well positioned to accommodate any possible future changes to the wider framework. A key area of focus is ensuring that we consider the 'totality' of change within ATM/ANS and the capacity of the sector, including the CAA, to implement that change.

3.15 The CAA aims to have finalised the development of the revised ruleset by the end of 2028. Implementation will commence shortly thereafter and will require a transition period to provide time to adopt the new model. Views on the duration of that transition period will be sought from the sub-group and through consultation. The CAA anticipates that transition may take between 18 to 24months, perhaps longer depending upon the scale and complexity of the individual unit and ANSP. Consequently, we believe that transition could be completed by late-2030.

The cost of transition and implementation

3.16 The CAA is cognisant that there is a cost associated with the implementation of the revised ruleset, as there is with any change. As stated earlier, the CAA continues to support the DfT in its aspiration to reform the regulatory framework for aviation safety. Our work on a revised ruleset for ATS would sit within the context of (and complement) any future reformed framework and thus seek to minimise the cost of change on industry.

3.17 The CAA has estimated[5] that the monetised impact of the implementation of the revised ruleset will be up to £0.2M. This would be a 'one-off' cost of implementation. These figures will be reviewed and, if necessary, refined and updated for incorporation into the impact assessment that will be included within the consultation package.

[5] Based on data obtained in July 2025.

3.18 3.18 The CAA is aware that the complexity of the existing ruleset increases costs to industry in their achievement of compliance. Accepting that there is a difference between the costs of implementation and those of the steady state operation, in the long-term, simplification of the revised ruleset could result in little overall change to costs. It is also worth highlighting that one of the tasks of the subgroup will be to develop materials to support industry's implementation of the revised ruleset and thus reduce the cost of implementation.

Rules of the Air rulemaking

3.19 Our intention is to create distinct rulesets that remove, or at least minimise, the duplication of content between the ATS ruleset and the Rules of the Air Regulations. While it is envisaged that requirements for voice communication procedures will remain within the future Rules of the Air Regulations (because they apply to both pilots and ATS), this work will ensure that all other requirements for ATS providers are contained wholly within the ATS ruleset.

Equality Act 2010

3.20 The CAA is required to comply with the Public Sector Bodies Accessibility Regulations 2018 and ensure that our content can be used by as many people as possible, including audiences with visual, motor, cognitive and hearing impairments. The revised format of the ruleset is already in-use and meets accessibility and readability requirements. Consequently, there should be no changed or additional impact on neurodiverse individuals or those with learning difficulties such as dyslexia.

Chapter 4

Next steps

Establishing the sub-group

4.1 The CAA's priority after publishing this document will be to establish the 'PartATS Sub-Group' and for it to have started its work by March 2027. The organisations listed below will be invited to nominate a member and, if they consider it necessary, one or more advisers to participate in the sub-group.

- Air Navigation Solutions Ltd (ANSL);
- Airspace & ATS Committee (AATS) from AirportsUK;
- Guild of Air Traffic Control Officers (GATCO);
- Global ATS Ltd;
- Highland & Islands Airports Limited (HIAL);
- Military Aviation Authority (MAA) ATM Regulations;
- NATS (NERL, NSL and College); and
- Prospect ATCOs' Branch.

4.2 In addition to the organisations listed above, colleagues from the CAA's Airspace, ATM & Aerodromes Division will participate in the sub-group.

Use of responses

4.3 While we have been unable to publish individual responses to our Call for Information in this document, we think that the sub-group will gain great benefit from being able to read them. Consequently, where appropriate, responses from stakeholders will be anonymised and then shared with the sub-group to inform their development of the ruleset and the materials that will be necessary to support implementation.

Updates on progress

4.4 We do not want the next time you hear of this work to be when we launch the formal consultation on our rulemaking proposals. We aim to keep you updated on the sub-group's progress and, subject to the group's working arrangements, we expect that the members of the sub-group will wish to provide updates to their colleagues.