

Assimilated Regulation (EU) 139/2014 and CAP168

Consultation Response Document

The second consultation on additional changes to Assimilated Regulation (EU) 139/2014 and CAP168 received four responses. One response had no comments on the question and no issues with the proposed changes. Another response pointed out spelling and grammar errors in the draft document, which will be addressed during the publication process. Two respondents, representing personal views, agreed to have their comments published. These comments, along with the CAA's responses, are detailed below, with personal details redacted for privacy and GDPR compliance. The CAA found that there are no issues with the proposed changes based on the feedback received.

Responses to the consultation

Respondent 1

Private individual Member of the long-suffering public and the aviation world
Personal Views
Publish response

Question

Do the proposals provide sufficient detail to enable compliance with the intent of the relevant implementing rules? - If you answer NO, please ensure you explain which of the proposed amendments to the implementing rules does not contain sufficient detail to enable compliance, why and what you would suggest instead in the relevant section:

Respondent comments

"As usual the UK are capitulating to international pressure. We need to do what is good for the UK. We need to make our own decisions and only spend money, make operators spend money where there is benefit. Brexit means we make our own laws regulations and standards. We don't need to EU or anyone else to tell us what to do. The CAA are a great case in point where adherence to multiple regulation standards load the public, companies and operators with costs they don't need.

The CAA need to think about businesses operating in the UK and the support they should be giving to those businesses. Not loading them up with more regulation and standards.

I know the CAA think they exist for the sake of the CAA but that's not actually how it should work. The CAA should be a light touch organisation that supports the UK aviation industries not load them with costs."

CAA Response:

The Civil Aviation Authority (CAA) is committed to ensuring the safety, security, and efficiency of the UK aviation industry.

The primary role of the CAA is to maintain high safety standards to protect passengers, crew, and the public. This requires adherence to our international obligations ensuring consistency and safety across borders.

The CAA actively works to support UK aviation businesses by providing guidance, reducing unnecessary regulatory burdens, and promoting innovation within the industry.

While Brexit allows the UK to set its own regulations, the CAA aims to balance national interests with international cooperation to maintain high safety standards and facilitate global operations.

The CAA strives to manage regulatory costs effectively and is open to feedback from industry stakeholders to ensure that regulations are proportionate and beneficial.

The CAA is committed to continuous improvement and regularly reviews its processes and regulations to better support the UK aviation industry.

Question

Does the proposed changes cause significant operational financial or infrastructure issues, if so, please provide information of the issues: - If you answer YES, please ensure you explain in more detail in which areas are a cause of the and why:

Respondent comments

"Of course it does, and change an individual or organisation does cost money to implement. While they are implementing your newly thought up change they aren't making money.

You CAA people sitting at home thinking up way to 'regulate' the industry should sit there and think up ways to remove regulation, streamline operations so the UK become a world leader. Not a country mired with regulation and costs.

I know you want to make the CAA a behemoth, though it already is largely, but you need to be thinking neat, tidy, simple.

Take a tip from the US and DOGE. Both in the way the CAA runs but also in the way you load up the industry."

CAA Response

The Civil Aviation Authority (CAA) understands the concerns about the costs and impacts of regulatory changes on businesses. The CAA is committed to finding a balance between necessary regulation and fostering innovation. We continuously review our regulations to identify areas where we can streamline processes and reduce unnecessary burdens. We undertake impact assessments and consultations as part of our regulatory principles.

We actively engage with industry stakeholders to understand their challenges and work together to develop solutions that support business growth while maintaining high safety standards.

The CAA is focused on making our operations more efficient and simplifying regulatory requirements where possible. We aim to create a regulatory environment that is both effective and supportive of the UK aviation industry's competitiveness.

We look at best practices from other countries to improve our regulatory framework. We also participate in regulatory development at ICAO. Our goal is to adopt approaches that enhance efficiency without compromising safety.

The CAA is dedicated to continuous improvement and welcomes feedback from all stakeholders. We strive to be a responsive and adaptive organisation that meets the needs of the industry

Question

Does the change in the change to the aerodrome audit cycle cause any significant issues? - If you answer YES, please ensure you explain in detail your reasoning:

Respondent comments

"Unless it is a reduction, which I know without reading it it isn't, of course it does.

The people running our airfields are experts in their operations. Let them run them, give them the flexibility to do so in an efficient manner don't be forcing them audit after audit. Self policing is the way to go."

CAA response

The CAA recognises the expertise of those running our airfields and the importance of operational flexibility. The CAA aims to strike a balance between necessary oversight and operational flexibility. We understand the need to minimise disruptions and allow experts to manage their operations efficiently. We are committed to reducing unnecessary regulatory burdens and are continuously reviewing our processes to identify areas where we can streamline requirements with a risk-based oversight approach.

The CAA supports self-regulation where appropriate and feasible, ensuring that safety and efficiency are maintained without excessive oversight. We actively engage with industry stakeholders to gather feedback and work together to develop practical solutions that benefit the entire aviation sector.

The CAA is dedicated to continuous improvement and welcomes input from all stakeholders to ensure our regulations are effective and supportive of the industry's needs and are committed to working collaboratively to achieve a safe, efficient, and thriving aviation sector in the UK.

Question

Does the consultation provide sufficient information on the change proposals give sufficient clarity? - If you answer NO, please ensure you explain which of the proposed amendments to the implementing rules does not contain sufficient detail to enable compliance, why and what you would suggest instead in the relevant section:

Respondents' comments

"I love the way everything the CAA is written so it makes no sense. Have you read the E mail? What does it tell anyone?

We at the CAA can use letter and number to bamboozle people into thinking 'this doesn't apply to me'"

CAA Response

The Civil Aviation Authority (CAA) strives to communicate clearly and effectively with all stakeholders.

We are committed to ensuring that our communications are clear and understandable. We continuously work on improving the way we convey information to avoid confusion.

We aim to make sure that our communications are relevant and applicable to the recipients. If you feel that certain information is unclear or not applicable, we encourage you to reach out for clarification.

The CAA is focused on simplifying our processes and communications to make them more accessible and easier to understand.

We value feedback from all stakeholders and use it to improve our communication strategies. Your input helps us identify areas where we can enhance clarity and effectiveness.

What is your proposed solution or amended text? - What is your proposed solution or amended text?

"Completely review the mission statement of the CAA.

Set the organisation on a path to support the UK aviation industry though light touch regulation and review everything you do to make sure you help the industry not load it up with something else because the CAA as an organisation only feel good about itself when it creating work for those it deals with."

CAA Response

The Civil Aviation Authority (CAA) is committed to supporting the UK aviation industry and continuously reviews its mission and operations to ensure they align with this goal.

The CAA regularly reviews its mission statement to ensure it reflects our commitment to supporting the UK aviation industry through effective and efficient regulation.

We aim to implement light touch regulation where possible, reducing unnecessary burdens while maintaining high safety standards. Our focus is on helping the industry thrive by providing guidance, promoting innovation, and ensuring regulations are proportionate and beneficial.

Respondent 2

Authorised by company (Airport operator)

No issues

Respondent 3

Publish response

Personal Views

Questions responded to;

Question

Do the proposals provide sufficient detail to enable compliance with the intent of the relevant implementing rules? - If you answer NO, please ensure you explain which of the proposed amendments to the implementing rules does not contain sufficient detail to enable compliance, why and what you would suggest instead in the relevant section:

Respondents' comments

The proposed helicopter aiming point lighting describes the use of 3 lights either side to indicate preferred landing direction however the diagram shows 3 lights on each of the 3 sides and no indication of how these lights would be changed to indicate preferred landing direction.

CAA Response

The alignment lights are additional to the triangle, as would be the case on a combined FATO/TLOF where there is a restricted approach or limited safeguarded approach (ICAO Annex 14 Vol II Figure 5-10).

Question

Does the proposed changes cause significant operational financial or infrastructure issues, if so, please provide information of the issues: - If you answer YES, please ensure you explain in more detail in which areas are a cause of the and why:

Respondents' comments

I am not aware of many (if any) licensed airfields currently using a lit helicopter aiming point and this may require additional investment.

CAA Response

The aiming point marking and lighting is the current standard for UK licensed/certificated aerodromes, with other methodologies allowed on a site-specific bases such as the NATO T. For example, in Regulation 139/2014 CS-HPT-DSN.F.550 for certificated aerodromes.

For licensed in CAP168 it refers to ICAO Annex 14 Vol II as the standards that an aerodrome license will be granted against (CAP 168 Chapter 12 12.4), the aiming point marking has been in force as a ICAO SARP since 2005.

Question

What is the issue that you have identified? - What is the issue that you have identified?

Respondent comments

unclear how the helicopter aiming point lighting would be used to indicate preferred landing direction

CAA Response

For daytime visual approaches this is indicated by the positioning of the H marking. For night operations additional alignment lighting is used, which may include painted/concrete arrows.

Question

What is your proposed solution or amended text? – What is your proposed solution or amended text?

Respondent comments

If the centre of the three lights could be switched off on one side the remaining sides could form an arrow indicating preferred landing direction.

No CAA comment