

INVENTORY OF ANSWERS

to the consultation document on the applicability, basic principles and essential requirements for pilot licensing and air operations and for the regulation of third country aircraft operated by third country operators

List of commenters to the consultation document and related abbreviations

- Aero Club of Switzerland (AeCS)
- Airbus
- Andrew Nicoll
- Anthony John French
- Aircraft Owners and Pilots Association-Denmark (AOPA-Denmark)
- Aircraft Owners and Pilots Association-UK (AOPA-UK)
- Association of European Airlines (AEA)
- Austrian Ministry of Transport
- Austrocontrol
- Belair
- British Midland International (BMI)
- Bristow Helicopters Ltd
- British Airways Plc (BA)
- British Gliding Association (BGA)
- Business Aircraft Users Association (BAUA)
- CATS Aviation Training
- Charles Neville
- Chris Barham
- Christopher Tandy
- Civil Aviation Administration-Denmark (CAA-Denmark)
- Civil Aviation Administration-Finland (CAA-Finland)
- Civil Aviation Administration-Greece (CAA-Greece)
- Civil Aviation Authority-Estonia (CAA-Estonia)
- Civil Aviation Authority-Norway (CAA-Norway)
- Civil Aviation Authority-UK (CAA-UK)
- Civil Aviation Office-Poland (CAA-Poland)
- Cynthia M.B. Reid
- D. Kynaston
- Deutscher Ultraleichtflugverband (DULV)
- Direction Générale de l'Aviation Civile (DGAC-France)
- Direction Générale du Transport Aérien (CAA-Belgium)
- Dr. Jörg Siedenburg
- Dr. Julian Scarfe
- Dutch Ministry of Transport
- Easy Jet
- Edinburgh Flying Club (EFC)
- Ente Nazionale per l'Aviazione Civile-Italy (ENAC)
- Eurocopter
- Europe Air Sports (EAS)
- European Association of Airline Pilot Schools (EAAPS)

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- European Cockpit Association (ECA)
- European Council for General Aviation Support (ECOGAS)
- European Gliding Union (EGU)
- European Hang Gliding & Paragliding Union (EHG&PU)
- European Helicopter Association (EHA)
- European Microlight Federation (EMF)
- European Transport Workers Federation (ETF)
- Federal Aviation Administration (FAA)
- Federal Office for Civil Aviation (FOCA)
- Fédération Française des Constructeurs Amateurs & Aéronefs de Collection (RSA)
- Fédération Nationale de l'Aviation Marchande (FNAM)
- General Aviation Awareness Council (GAAC)
- General Aviation Manufacturers Association (GAMA)
- Gerjo Hultink
- German Ministry of Transport
- Guild of Air Pilots & Air Navigators (GAPAN-UK)
- Guy Charbonier
- Helicopter Club of Great Britain
- Hendry-Smith
- Higherplane Aviation Training
- I. Douvris
- I.W. Slater
- Ian G. Ellis
- International Air Carrier Association (IACA)
- International Business Aviation Council (IBAC)
- International Federation of Airline Dispatchers Associations (IFALDA)
- Irish Aviation Authority (IAA)
- J.P. Meunier
- J.R. Jones
- John Holt
- Light Aircraft Association of the Czech Republic (LAA-Czech)
- Luftfahrt-Bundesamt (LBA)
- Luftfartsverket-Swedish Aviation Safety Authority (CAA-Sweden)
- Malcolm Hodgson
- Mark Northway
- Matthew Cunningham
- Michael Fortescue
- Microlight Commission Deutsche Aero Club (DAeC)
- National Aero Club of Ireland (NACI)
- NetJets Inc.
- Paul Draper
- Paul Hendry-Smith
- Popular Flying Association (PFA)
- Prutech Innovation Services Ltd.
- QuinetiQ Ltd.
- Robert Ross
- R.S. Biggart
- Sikorsky Aircraft
- Swiss Aviation Training
- Syndicat National des Pilotes de Ligne (SNPL)

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- Timothy Natham
- Torbjorn Rehn (TRCAB)
- Unmanned Aerial Vehicle Systems Association (UAVSA)

Other abbreviations used in the inventory of answers

- AOC: Air Operator Certificate
- ER: Essential Requirements
- EU: European Union
- HMPA: Heavy Motor-Powered Aircraft
- ICAO: International Civil Aviation Organisation
- IR: Implementing Rules
- JAR: Joint Aviation Requirements
- MEP: Multiple Engine Piston
- MTOM: Maximum Take-Off Mass
- NAA: National Authorities
- PAX: Passenger
- PPL: Private Pilot Licence
- SARP: Standards and Recommended Practices
- SEP: Single Engine Piston
- UAV: Unmanned Aerial Vehicle

Question 1

The Agency is interested in knowing the opinion of stakeholders on the best means to set the safety objectives for the regulation of air operations and flight crew licensing: the transposition by reference of related ICAO Standards or the establishment of dedicated essential requirements at Community level.

Comment number	From	Nature
53	CAA-Belgium	All these comments support the adoption of Essential Requirements (ERs) at Community level. Many insist on the need for consistency with ICAO Standards and existing JARs. A few consider however that deviation from ICAO should be avoided as much as possible to avoid either dis-harmonisation at global level or imposing undue burden on European operators. They also draw the attention to the need to promote European ERs as candidates for ICAO Standards.
188	Edinburgh Flying Club	
195-209	CAA-UK	
241-256	IBAC	
277	FOCA	
293	British Airways	
356	EHA	
384	AEA	
435	BAUA	
505	Bristow helicopters Ltd.	
513	IFALDA	
554	IACA	
617	FNAM	
621	AOPA-UK	
650	German Ministry of Transport	
693	SNPL	
758	Airbus	
831	LBA	
897	EGU	
979	EAS	
1001	CAA-Norway	
1020	CAA-Denmark	
1035	ENAC	
1088	ECOGAS	
1124	ECA	
1154	Austrocontrol	
1158	CAA-Sweden	
1220	BGA	
1259	EAAPS	
1272	ETF	
1293	Matthew Cunningham	
1333	CAA-Finland	
1383	AeCs	
1427	FAA	
1491	Austrian Ministry of Transport	
1514	GAMA	
1547	Dutch Ministry of Transport	
1549	Swiss Aviation Training	

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Comment number	From	Nature
1568 1583 1626 1627 1628 -	AOPA-Denmark CAA-Estonia CAA-Poland Belair IAA DGAC-France	
174 629 935 1084 1442 1466 1599	Eurocopter Andrew Nicoll RSA BMI Helicopter club of GB Higher plane aviation training NACI	These comments support the transposition of ICAO Standards as the basis for Community regulation. A few would however accept dedicated Community ERs provided they do not produce additional burden on operators.
81 103 & 106 648	Paul Draper Guy Charbonnier Charles Neville	These commenters suggest regulating aviation in the Community by transposing Federal Aviation Administration rules (FARs).
124 266 740-962 918 1067 1083 1300	PFA Michael Fortescue EMF EHPU DULV DAeC LAA-Czech	These comments consider the question as not relevant as they want the type of activity they represent to be excluded from the scope of Community competence. Most prefer the continuation with national regulations, a few insist however on the need for the Community to ensure free movement for these types of activities.

Question 1

Analysis: An overwhelming majority of commenters support the elaboration of dedicated Community Essential Requirements to serve as a basis for the safety regulation of air operations and pilots licensing. If the policy envisaged by the Agency were to exclude a variety of recreational activities using ultra-lights, simple aircraft there would be nearly no resistance to incorporating in the EASA Regulation such ERs provided they ensure full consistency with ICAO Standards and do not impose undue additional burden.

Question 2

The Agency is interested in knowing whether the attached essential requirements actually meet the criteria developed here above and constitutes a good basis for the regulation of air operations and pilot proficiency. The Agency also welcomes any suggestion to improve the essential requirements as described in Annex 1 and 2 by using the forms provided, including proposals to address flight engineers.

Comment number	From	Nature
241-256	IBAC	These commenters broadly accept the proposed drafts for ERs as an acceptable basis. They however suggest various improvements, which are analysed in the CRD related to Annexes I and II of the consultation document.
278	FOCA	
355	EHA	
436	BAUA	
504	Bristow Helicopter Ltd.	
555	IACA	
610-747	FNAM	
622	AOPA	
651	German Ministry of Transport	
832	LBA	
936	RSA	
1002	CAA-Norway	
1021	CAA-Denmark	
1036	ENAC	
1089	ECOGAS	
1154	Austrocontrol	
1159	CAA-Sweden	
1260	EAAPS	
1273	ETF	
1294	Matthew Cunningham	
1492	Austrian Ministry of Transport	
1529	Dutch Ministry of Transport	
1584	CAA-Estonia	
1626	CAA-Poland	
1627	Belair	
1628	IAA	
-	DGAC-France	

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Comment number	From	Nature
56 79 125 739 759 898 919 980 1066 1082 1221 1301 1384 1443 1515 1570 1600	CAA-Belgium Sikorsky Aircraft PFA EMF Airbus EGU EHG&PG EAS DULV DAeC BGA LAA-Czech AeCS Helicopter Club of GB GAMA AOPA-Denmark NACI	These comments consider that the current drafts are not adequate to address the needs of activities other than commercial air transportation such as light recreational flying, general aviation, corporate aviation, aerial work, flight testing. While half of the comments consider that current drafts could be improved to provide a global basis for all types of activities, the other half suggests separate requirements for these two different types of activities.
294 385	British Airways AEA	These comments consider that the current drafts are not satisfactory because they are too detailed and are not structured in a way which allows catering for all types of operations.
694 1550	SNPL Swiss Aviation Training	These comments consider that the current drafts are not satisfactory because they are too detailed and do not concentrate on essential safety criteria.
1125	ECA	This comment considers that the current drafts are not satisfactory as they do not require everyone working in a cockpit to be fully licensed.
82 107 649	Paul Draper Guy Charbonnier Charles Neville	These comments consider that the current drafts are not satisfactory because they are too general and give no details on how their implementation would vary according to the licences and aircraft type.
180	J.P. Meunier	This comment considers that the current drafts are not satisfactory as they do not include requirements for flight engineers. It has to be noted that no drafting suggestion has been done by any commenter for such requirements.

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Comment number	From	Nature
195 1249	CAA-UK GAPAN-UK	These comments consider that the current drafts are not satisfactory and require substantial amendments.
514	IFALDA	This comment considers that current draft of ER for air operations are not appropriate as they ignore the critical function of operational control / flight dispatch.
1334	CAA-Finland	This comment reserves the position of the commenter as long as there is no global view on the final institutional system, including the text of articles to be included in the EASA Regulation and the content of implementing rules (IRs).
1485	Malcolm Hodgson	This commenter expresses concerns that the current drafting of Annex I on medical and physical fitness may not provide sufficient flexibility to address cases as his own one.

Question 2

Analysis: *Apart from a few comments, which reflect a confusion between safety standards expressed in the form of Essential Requirements and their means of implementation, views on the adequacy of the proposed drafts for ERs are relatively balanced. While most comments indicate that they constitute a good basis for the regulation of commercial air operations and professional pilots, a strong minority consider that significant improvements have to be made to cover other types of operations and aircraft pilots involved in general and recreational aviation.*

Question 3

Do stakeholders agree that third country aircraft used for non-commercial activities in the Community by third country operators should be subject to Community legislation?

Comment number	From	Nature
57 171 195-209 279 295 354 386 556 611 695 1003 1037 1126 1154 1160 1274 1420 1493 1540 1626 1627 1628 -	CAA-Belgium Eurocopter CAA-UK FOCA British Airways EHA AEA IACA FNAM SNPL CAA-Norway ENAC ECA Austrocontrol CAA-Sweden ETF FAA Austrian Ministry of Transport Dutch Ministry of Transport CAA-Poland Belair IAA DGAC-France	All these comments support the idea that third country aircraft used for non-commercial activities in the Community by third country operators should be subject to Community legislation. Several insist however that this should not affect the free movement principle enshrined in the Chicago Convention, nor impose on such operators requirements which would not apply to Community operators.
83 594	Paul Draper Charles Neville	These comments support the concept of Community regulation to impose maintenance and certification standards equivalent to the Community ones.
623	AOPA-UK	This comment agrees with the concept of Community legislation provided that it is limited to random surveillance of compliance with ICAO Standards.

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Comment number	From	Nature
191-194 241 267 437 503 511 630 866 985 1022 1295 1302 1385 1444 1467 1516 1551 1569 1601	IAOPA IBAC Michael Fortescue BAUA Bristow Helicopters Ltd. John Holt Andrew Nicoll GASCO EAS CAA-Denmark Matthew Cunningham LAA-Czech AeCS Helicopter club of GB Higher plane aviation training GAMA Swiss Aviation Training AOPA-Denmark NACI	These comments insist on the need to respect the spirit of the Chicago Convention and to rely on the state of operator to ensure that ICAO Standards are actually met. Some insist that doing otherwise may affect the freedom of movement of European operators. Some drew attention to ICAO procedures to deal with cases of non compliance.
126 738 905 920 1065 1081	PFA EMF EGU EH&PU DULV DAeC	These comments do not support Community regulation of the types of third country aircraft they represent (amateur built aircraft, light aircraft, micro-lights, gliders, hang gliders and para-gliders)
652 833 937 1090 1228 1335 1585	German Ministry of Transport LBA RSA ECOGAS BGA CAA-Finland CAA-Estonia	These comments are not favourable to the concept of Community regulation of third country aircraft used by third country operators, which they consider to be against the spirit of the Chicago Convention. They recognise however the need to avoid that such freedom of movement is used to circumvent EU rules applicable to EU registered aircraft. They suggest therefore addressing this issue by an obligation to register aircraft in EU Member States if they stay in the European territory beyond a certain period of time.
1250	GAPAN-UK	This commenter suggests the production of a list of non accepted operators to protect Community citizens.

Question 3

***Analysis:** The majority of comments are not in favour of establishing Community competence to regulate non-commercial activities of third country aircraft operated by third country operators. There is however a majority of comments recognising the need to address the case of third country aircraft more or less permanently based in the territory of Member States. A policy based on the principle of free movement established by the Chicago Convention, supported by appropriate surveillance and complemented by an obligation for third country aircraft based in the territory of Member States to be subject to corresponding Community rule, is likely to be strongly supported.*

Question 4 a) and b)

a) Do stakeholders agree that all categories of pilots should be subject to Community legislation?

b) If not, which categories should be excluded?

Comment number	From	Nature
296 775 1023 1127 1154 1275 1421 1517 1586 1627 1628	British Airways Christopher Tandy CAA-Denmark ECA Austrocontrol ETF FAA GAMA CAA-Estonia Belair IAA	These commenters fully agree that all categories of pilots should be subject to Community legislation. The FAA calls attention to the fact that it is vital to retain integration among all EU Member States and to be harmonised as much as possible with FAA.
906 1229	EGU BGA	This group of commenters only comments on their activity: they believe glider pilots should be included in Community legislation.
58 77 245 438 696 1038 1602	CAA-Belgium Prutech Innovation Services IBAC BAUA SNPL ENAC NACI	These commenters agree that all pilots should be subject to Community legislation, but consider that the requirements should be proportionate to the type of activity.
187 280 612	EFC FOCA FNAM	These commenters believe that only the categories of pilots that are currently covered by JAR-FCL should be covered by Community legislation. FNAM also adds that the PPL requirements should be less onerous.

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Comment number	From	Nature
<p>127 143 198 618 737 760 863 867 888 921 986 1004 1064 1080 1161 1251 1296 1304 1336 1445 1494 1563 1581 -</p>	<p>PFA RSA CAA-UK AOPA-UK EMF Airbus J.R. Jones GASCO WE Blackledge EHG&PU EAS CAA-Norway DULV DAeC CAA-Sweden GAPAN-UK Matthew Cunningham LAA-Czech CAA-Finland Helicopter Club of GB Austrocontrol Mark Northway AOPA-Denmark DGAC-France</p>	<p>These commenters are of the opinion that pilots involved in non-commercial activities on some types of aircraft should be excluded from Community legislation. The following types of aircraft are mentioned:</p> <ul style="list-style-type: none"> ▪ Amateur build aircraft; ▪ Ultralight and microlight; ▪ Para glider; ▪ Hang glider; ▪ Aeromodels; ▪ Aircraft excluded under annex II of the EASA Regulation; ▪ Ex-military aircraft; ▪ Autogyros; ▪ Powered parachutes; ▪ Balloons. <p>Others:</p> <ul style="list-style-type: none"> ▪ Skydivers. <p>Some of the commenters believe that the excluded pilots should be covered by a licence similar to the UK national PPL concept.</p>
<p>353 387 502 653 770 834 1626</p>	<p>EHA AEA Bristow Helicopters Ltd. German Ministry of Transport Anthony John French LBA CAA-Poland</p>	<p>These commenters believe that pilots of certain categories of aircraft should be excluded from Community legislation.</p> <p>The differentiation between the categories of aircraft is mostly based on weight criteria and seat capacity. The following categories of aircraft are mentioned:</p> <ul style="list-style-type: none"> ▪ Aircraft with a MTOM below 900 kg; ▪ Aircraft with a MTOM below 750 kg; ▪ Aircraft with a MTOM below 150 kg; ▪ Aircraft with a seat capacity of maximum 4 seats.

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Comment number	From	Nature
84 108 262 268 359 547 591 592 635 777 1091 1261 1463 1539 1552	Paul Draper Guy Charbonier Paul Hendry Smith Michael Fortescue D. Kynatson John Holt I.W. Slater Charles Neville Chris Barham Cynthia M.B. Reid ECOGAS EAAPS Higherplane Aviation Training Dutch Ministry of Transport Swiss Aviation Training	These commenters believe that all non-commercial pilots should be excluded from Community legislation. Some, however, add comments on the necessity of licence recognition or crediting of experience in all EU Member States. Higherplane Aviation Training suggests a national licence recognised in all EU Member States.
1474	Dr. Julian Scarfe	This commenter does not answer the question, but mentions the need to retain access to ICAO Standard licences.

Question 4 a) and b)

Analysis: A minority of commenters fully agrees with the principle that all categories of pilots should be subject to Community legislation. Similarly, only a few fully disagree with this principle. The remainder, making up the majority, supports Community action for all pilots provided that exclusions are made for certain categories of aircraft and that requirements are made proportionate to the type of activity.

Excluded aircraft could be those covered by Annex II of the EASA Regulation, subject to possible adjustments to take into account the various suggestions made. Furthermore, some of the comments ask that pilots of sport and recreational aircraft should be covered by a licence similar to the UK National PPL concept. A policy providing a lighter regulatory touch for such pilots would have even stronger support.

Question 5 a), b) and c)

- a) Do stakeholders agree that all non-commercial operations should be subject to Community legislation?
- b) If not, should:
- corporate aviation and/or
 - recreational aviation be excluded?
- c) Would the answer be dependent on the type of aircraft? If so, what should be the threshold?

Comment number	From	Nature
59	CAA-Belgium	These stakeholders believe that all non-commercial operations should be subject to Community legislation.
75	Tymothy Nathan	
78	Prutech Innovation Services Ltd.	
170	Eurocopter	
199	CAA-UK	
246	IBAC	
263	Hendry-Smith	
281	FOCA	
297	British Airways	
352	EHA	
388	AEA	
439	BAUA	
501	Bristow Helicopters Ltd	
654	German Ministry of Transport	
697	SNPL	
761	Airbus	
835	LBA	
907	EGU	
1063	ENAC	
1092	ECOGAS	
1128	ECA	
1154	Austrocontrol	
1230	BGA	
1276	ETF	
1297	Matthew Cunningham	
1387	AeCS	
1422	FAA	
1495	Austrian Ministry of Transport	
1518	GAMA	
1553	Swiss Aviation Training	
1564	Mark Northway	
1587	CAA-Estonia	
1626	CAA-Poland	
1627	Belair	
1628	IAA	

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Comment number	From	Nature
85 104 186 431 548 590 595 613 632 868 987 1005 1024 1262 1538 -	Paul Draper Guy Charbonnier EFC Dr. Jörg Siedenbug John Holt I.W. Slater Charles Neville FNAM Andrew Nicoll GASCO EAS CAA-Norway CAA-Denmark EAAPS Dutch Ministry of Transport DGAC-France	These stakeholders think that recreational activities should be excluded.
128 144 619 736 922 1063 1079 1162 1305 1337 1476 1580 1604	PFA RSA AOPA-UK EMF EHPU DULV DaeC CAA-Sweden LAA-Czech CAA-Finland CATS AOPA-Denmark NACI	These stakeholders think that non-commercial operation of aircraft in Annex II of EASA Regulation should be excluded.
96, 97 771 1446	GAAC Anthony John French Helicopter Club of GB	These stakeholders believe that non-commercial operations of aircraft under a certain weight or size limit should be excluded.
636 638 778	Chris Barham ECA Cynthia M.B. Reid	These stakeholders believe that non-commercial activities of some aircraft should be excluded. They proposed no limit.
269 1464	Michael Fortescue Higherplane Aviation Training	These commenters believe that all non-commercial activities should be excluded.

Question 5 a), b) and c)

***Analysis:** Two main groups can be identified. Those that favour all non-commercial activities being subject to Community legislation and those that wish to exclude recreational activities or the non-commercial operation of aircraft of certain types or below a certain threshold, to be defined. Excluded aircraft could be those covered by Annex II of the EASA Regulation, subject to possible adjustments to take into account the various suggestions made. A clear majority of the commenters is therefore in favour of non-commercial operations being subject to EC legislation provided an appropriate solution is found to exclude the activities of certain aircraft.*

Question 6 a)

a) Do stakeholders agree that fractional ownership operations should be subject to Community legislation?

Comment number	From	Nature	
60	CAA-Belgium	All these comments support the idea that fractional ownership operations should be subject to Community legislation.	
86	Paul Draper		
110	Guy Charbonnier		
129	PFA	Some would like this limited to aircraft with a MTOM > 5700kg.	
145	RSA		
169	Eurocopter	Most stakeholders would like fractional ownership and shared ownership to be differentiated to avoid applying to aircraft owned by aero-clubs the same treatment envisaged for aircraft usually operated under fractional ownership arrangements.	
247	IBAC		
282	FOCA		
298	British Airways		
351	EHA		
389	AEA		
440	BAUA		
500	Bristow Helicopters Ltd.		
549	John Holt		
596	Charles Neville		
614	FNAM		Some feel that aircraft in Annex II of EASA Regulation could be excluded.
620	AOPA-UK		
655	German Ministry of Transport	One commenter introduced a limit of 3t or 10 PAX under which fractional ownership operations should be excluded from the scope of Community legislation.	
698	SNPL		
735	EMF		
836	LBA		
908	EGU		
923	EHGPU		
988	EAS		
1062	DULV		
1078	DAeC		
1093	ECOGAS		
1129	ECA		
1231	BGA		
1263	EAAPS		
1277	ETF		
1298	Matthew Cunningham		
1309	LAA-Czech		
1388	AeCS		
1423	FAA		
1428	NetJets Inc.		
1447	Helicopter Club of GB		
1468	Higherplane Aviation Training		
1496	Austrian Ministry of Transport		
1519	GAMA		

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Comment number	From	Nature
1554 1579 1588 1607 1626 1627 1628 -	Swiss Aviation Training AOPA-Denmark CAA-Estonia NACI CAA-Poland Belair IAA DGAC-France	
762	Airbus	This commenter suggests that fractional ownership should be treated in the same way as corporate or recreational aviation.
200 1006 1025 1040 1154 1163 1338 1537	CAA-UK CAA-Norway CAA-Denmark ENAC Austrocontrol CAA-Sweden CAA-Finland Dutch Ministry of Transport	These commenters suggest that fractional ownership should be treated in the same way as commercial air transport.
633 869	Andrew Nicoll GASCO	These comments do not support Community regulation of fractional ownership operations.

Question 6 a)

Analysis: *There is a very clear consensus for fractional ownership operations to be subject to EC legislation. The general aviation community strongly feels that shared ownership of recreational aircraft should not be assimilated to fractional ownership. This leads to the need to clearly differentiate fractional ownership from shared ownership.*

Question 6 b)

b) Do stakeholders agree that unmanned air vehicles operations should be subject to Community legislation?

Comment number	From	Nature
60	CAA-Belgium	These comments consider that unmanned air vehicle operations should be subject to Community legislation.
86	Paul Draper	
95	TRCAB	
110	Guy Charbonnier	Some feel that aircraft included in Annex II of EASA Regulation could be excluded.
145	RSA	
169	Eurocopter	
200	CAA-UK	
247	IBAC	
265	QinetiQ Ltd.	
298	British Airways	
351	EHA	
389	AEA	
440	BAUA	
500	Bristow Helicopters Ltd	
508	UAVSA	
549	John Holt	
596	Chales Neville	
614	FNAM	
620	AOPA-UK	
633	Andrew Nicoll	
655	German Ministry of Transport	
698	SNPL	
762	Airbus	
836	LBA	
908	EGU	
923	EHG&PU	
1006	CAA-Norway	
1025	CAA-Denmark	
1040	ENAC	
1093	ECOGAS	
1129	ECA	
1154	Austrocontrol	
1163	CAA-Sweden	
1231	BGA	
1263	EAAPS	
1277	ETF	
1338	CAA-Finland	
1388	AeCS	
1424	FAA	
1496	Austrian Ministry of Transport	

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Comment number	From	Nature
1519 1537 1554 1579 1588 1626 1627 1628 -	GAMA Dutch Ministry of Transport Swiss Aviation Training AOPA-Denmark CAA-Estonia CAA-Poland Belair IAA DGAC-France	
129 869 1447	PFA GASCO Helicopter Club of GB	These comments are not favourable to the concept of Community regulation of unmanned air vehicle operations.
988	EAS	This comment suggests that unmanned air vehicle operations should be excluded from the scope of Community legislation unless commercially operated.

Question 6 b)

Analysis: *There is a very clear opinion for UAV operations to be subject to EC legislation with a reservation for UAVs covered by Annex II to EASA Regulation.*

Question 7
flight dispatchers

Do stakeholders agree that flight dispatchers should be subject to Community legislation?

Comment number	From	Nature
181 515 557 699 1007 1026 1041 1154 1278 1287 1389 1425 1480 1497 1555 1589 1626 1627 1628	J.P. Meunier IFALDA IACA SNPL CAA-Norway CAA-Denmark ENAC Austrocontrol ETF Matthew Cunningham AeCS FAA CATS Austrian Ministry of Transport Swiss Aviation Training CAA-Estonia CAA-Poland Belair IAA	These commenters agree that flight dispatchers should be subject to Community legislation. The FAA stressed the need to harmonise requirements with ICAO and FAA.
61 201 248 283 299 350 390 441 499 656 752 763 837 1094 1130 1164 1264 1339 1448 1536	CAA-Belgium CAA-UK IBAC FOCA British Airways EHA AEA BAUA Bristow Helicopters Ltd. German Ministry of Transport FNAM Airbus LBA ECOGAS ECA CAA-Sweden EAAPS CAA-Finland Helicopter Club of GB Dutch Ministry of Transport	These commenters do not agree that flight dispatchers should be subject to Community legislation. Some comments add that national regulations should be maintained.

Comment number	From	Nature
-	DGAC France	
130 772 909 924 941 968 989 1061 1077 1232 1311	PFA Anthony John French EGU EHG&PU RSA EMF EAS DULV DAeC BGU LAA-Czech	These comments did not provide an answer to the question.

***Question 7
flight dispatchers***

Analysis: A slight majority of the stakeholders seem to be in favour of excluding flight dispatchers from EC legislation.

However, comparing these results with the ones obtained on question 15, there seems to have been some confusion on the part of the stakeholders when answering this question. In fact, the majority of the stakeholders agreed, when answering to question 15, that common rules related to the qualifications necessary for the exercise of the function of flight dispatch were needed, although there was no need for a licence.

Since common requirements can only be achieved through Community legislation, it seems safe to assume that reasonable consensus could be reached if Community intervention is kept to a minimum, addressing only the qualifications needed to exercise the functions, rather than requiring flight dispatchers to hold a licence.

Question 7
flight engineers

Do stakeholders agree that flight engineers should be subject to Community legislation?

Comment number	From	Nature
61 181 557 656 699 837 1026 1041 1130 1164 1287 1339 1389 1425 1448 1536 1555 1589 1626 1627 1628 -	CAA-Belgium J.P. Meunier IACA German Ministry of Transport SNPL LBA CAA-Denmark ENAC ECA CAA-Sweden Matthew Cunningham CAA-Finland AeCS FAA Helicopter Club of GB Dutch Ministry of Transport Swiss Aviation Training CAA-Estonia CAA-Poland Belair IAA DGAC-France	These commenters agree that flight engineers should be subject to Community legislation. Some, particularly NAAs, emphasised that the requirements should be based on current JARs. The FAA stressed the need to harmonise requirements with ICAO and FAA.
201 248 283 299 350 390 441 499 752 763 772 1007 1094 1154 1264 1278 1497	CAA-UK IBAC FOCA British Airways EHA AEA BAUA Bristow Helicopters Ltd. FNAM Airbus Anthony John French CAA-Norway ECOGAS Austrocontrol EAAPS ETF Austrian Ministry of Transport	These commenters do not agree that flight engineers should be subject to Community legislation. FNAM stressed that the current JAR-FCL 4 should stay in force. Some insist on the need for recognition of national licences in all EU Member States.

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Comment number	From	Nature
130	PFA	These comments do not provide an answer to the question.
515	IFALDA	
909	EGU	
924	EHG&PU	
941	RSA	
968	EMF	
989	EAS	
1061	DULV	
1077	DAeC	
1232	BGU	
1311	LAA CZ	
1480	CATS	

***Question 7
flight engineers***

Analysis: A slight majority of the stakeholders believes that flight engineers should be subject to Community legislation.

Question 8 a) and b)

- a)** Do stakeholders agree that powers should be given to the Commission to adopt implementing rules for the regulation of the safety of third country aircraft flying in the territory covered by the EC Treaty?
- b)** Do stakeholders agree that the Agency should be given powers to verify that third country aircraft that do not hold a standard ICAO certificate of airworthiness do however meet a sufficient level of safety to fly in the territory covered by the EC Treaty?

Comment number	From	Nature
66	CAA-Belgium	All these commenters agree that the Commission should develop IRs to describe how the airworthiness of third country aircraft operated by third country operators should be verified at Community level. All also consider that the Agency should be given executive powers for the implementation of such IRs. Many however insist on the need to ensure consistency between these IRs and ICAO obligations of Member States. Some ask that such rules do not address aircraft or types of activities that are not otherwise regulated at Community level.
87	Paul Draper	
111	Guy Charbonier	
168	Eurocopter	
241	IBAC	
284	FOCA	
300	British Airways	
343	EHA	
391	AEA	
442	BAUA	
498	Bristow Helicopters Ltd.	
518	IFALDA	
558	IACA	
597	Charles Neville	
657	German Ministry of Transport	
700	SNPL	
764	Airbus	
838	LBA	
1042	ENAC	
1095	ECOGAS	
1131	ECA	
1154	Austrocontrol	
1165	CAA-Sweden	
1279	ETF	
1288	Matthew Cunningham	
1426	FAA	
1498	Austrian Ministry of Transport	
1520	GAMA	
1578	AOPA-Denmark	
1590	CAA-Estonia	
1627	Belair	
1628	IAA	
-	DGAC-France	

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Comment number	From	Nature
1533 1626	Dutch Ministry of Transport CAA-Poland	These two commenters agree that the safety of third country aircraft shall be subject to common rules adopted by the Commission. They however consider that they should be implemented at national level.
1008	CAA-Norway	This commenter agrees that the safety of third country aircraft shall be subject to common rules adopted by the Commission. Their implementation in Norway would be subject to the provisions of the European Economic Area Agreement.
910 990 1233 1390 1566	EGU EAS BGA AeCS Mark Northway	These commenters require that non-commercial activities be excluded from the scope of community regulation and see therefore no need to give powers to the Commission. They agree however that commercial operations should be subject to regulation and that the Agency be given powers in this domain.
1449	Helicopter club of GB	This comment requires aircraft below a certain weight not to be regulated at Community level provided they have standard ICAO certificate of airworthiness.
191 195 270 616 644 870 1027 1340 1465 1556	IAOPA CAA-UK Michael Fortescue FNAM AOPA GASCO CAA-Denmark CAA-Finland Higher plane aviation training Swiss Aviation Training	All these commenters see no need to go beyond ICAO obligations. Many however agree on the need to oversee the implementation of ICAO standards but they see it as a national task to be organised at Community level. In that context some see a role for the Agency in standardising national implementation.

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Comment number	From	Nature
131 733 925 942 1060 1076 1312 1608	PFA EMF EHG&PU RSA DULV DAeC LAA-Czech NACI	These commenters see no need to regulate at Community level the types of aircraft they represent. The question of implementation powers is therefore not relevant.

Question 8 a) and b)

Analysis: *There is a strong majority in favour of giving executive powers to the Commission and the Agency to regulate the airworthiness of third country aircraft operated by third country operators provided the related implementing rules respect the ICAO obligations of Member States and their scope is consistent with that of rules applicable to EU registered aircraft.*

Question 9 a) and b)

- a)** Do stakeholders agree that powers should be given to the Commission to adopt implementing rules for the regulation of the operation of third country aircraft flying in the territory covered by the EC Treaty?
- b)** Do stakeholders agree that the Agency should be given powers to issue appropriate approvals to third country air transport operators?

Comment number	From	Nature
67	CAA-Belgium	All these commenters agree that the Commission should develop IRs to describe how the operations of third country aircraft operated by third country operators should be overseen at Community level.
88	Paul Draper	
112	Guy Charbonier	
167	Eurocopter	
182	J.P. Meunier	
195	CAA-UK	
241	IBAC	
285	FOCA	
348	EHA	
443	BAUA	
497	Bristow Helicopters Ltd.	
516	IFALDA	
559	IACA	
598	Charles Neville	
701	SNPL	
1028	CAA-Denmark	
1043	ENAC	
1096	ECOGAS	
1132	ECA	
1154	Austrocontrol	
1241	GAPAN-UK	
1280	ETF	
1289	Matthew Cunningham	
1341	CAA-Finland	
1410	FAA	
1521	GAMA	Most consider that the Agency should be given executive powers for the implementation of such IRs but many question the exact nature of such role.
1591	CAA-Estonia	
1627	Belair	
1628	IAA	
-	DGAC-France	
		A few express doubts about the compatibility of a Community licensing with the ICAO system.
		A few others see also a role for National Authorities in the implementation of IRs.

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Comment number	From	Nature
658 765 839 1166 1499 1532 1626	German Ministry of Transport Airbus LBA CAA-Sweden Austrian Ministry of Transport Dutch Ministry of Transport CAA-Poland	These commenters agree that there should be Community rules adopted by the Commission to enforce ICAO Standards. They however consider that the Agency should have no role to play in their implementation, either because they see no need for the issue of approvals or they see them being implemented at national level.
1008	CAA-Norway	This commenter agrees that the operation of third country aircraft shall be subject to common rules adopted by the Commission. Their implementation in Norway would be subject to the provisions of the European Economic Area Agreement.
645 871 911 991 1234 1391	AOPA GASCO EGU EAS BGA AeCS	These comments require that non-commercial activities be excluded from the scope of Community regulation and see therefore no need to give powers to the Commission. Most have no opinion on the role to be played by the Agency while a few agree that it should be involved in the oversight of commercial operations.
1450	Helicopter club of GB	This comment requires aircraft below a certain weight not to be regulated at Community level provided they have standard ICAO certificate of airworthiness.
191 271 1577	IAOPA Michael Fortescue AOPA-Denmark	These three comments see no need to go beyond ICAO obligations.
301 392	British Airways AEA	These two comments consider that the oversight of third country aircraft and operators is a matter for National Authorities. They call however for EU intervention to refrain third countries from regulating EU airlines.

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Comment number	From	Nature
604	FNAM	This comment sees a need to control compliance with ICAO Standards and a possible role of the Agency together with National Authorities.
132 732 926 943 1059 1075 1314	PFA EMF EHG&GU RSA DULV DAeC LAA-Czech	These comments see no need to regulate at Community level the types of aircraft they represent. The question of implementation powers is therefore not relevant.

Question 9 a) and b)

Analysis: *There is a strong majority in favour of giving executive powers to the Commission and the Agency to regulate the operations of third country aircraft operated by third country operators flying in the territory covered by the EC Treaty provided the related implementing rules respect the ICAO obligations of Member States.*

Question 10 a)

a) Do stakeholders agree that pilots of corporate or heavy motor-powered aircraft should hold a licence? If so, what should be the definition of such heavy motor-powered aircraft?

Comment Number	From	Nature
178	J.P. Meunier	<p>These commenters agree that pilots of corporate or HMPA should hold a licence, without providing any definition of such aircraft.</p> <p>Some mention the need to retain consistency with ICAO Annex I and SARPs.</p> <p>Some additional comments were provided, namely:</p> <ul style="list-style-type: none"> ▪ that HMPA is covered by national PPL (team disputes this opinion); ▪ that recreational activities should be excluded from the definition of HMPA; ▪ that the HMPA discriminate should not be used; ▪ that pilots of HMPA should hold a type rating.
190	EFC	
204	CAA-UK	
251	IBAC	
286	FOCA	
302	British Airways	
347	EHA	
393	AEA	
444	BAUA	
496	Bristow Helicopters Ltd.	
550	John Holt	
605	FNAM	
659	German Ministry of Transport	
702	SNPL	
766	Airbus	
840	LBA	
893	WE blackledge	
1010	CAA-Norway	
1029	CAA-Denmark	
1044	ENAC	
1143	ECA	
1154	Austrocontrol	
1167	CAA-Sweden	
1242	GAPAN-UK	
1281	ETF	
1342	CAA-Finland	
1412	FAA	
1451	Helicopter Club of GB	
1500	Austrian Ministry of Transport	
1522	GAMA	
1546	Dutch Ministry of Transport	
1566	Mark Northway	
1576	AOPA-Denmark	
1592	CAA-Estonia	
1609	NACI	
1626	CAA-Poland	
1627	Belair	
-	DGAC-France	

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Comment Number	From	Nature
54 133 149 646 872 912 927 1097 1235 1265 1290	CAA-Belgium PFA RSA AOPA-UK GASCO EGU EHG&PU ECOGAS BGA EAAPS Matthew Cunningham	<p>These commenters agree that pilots of corporate or HMPA should hold a licence and provide criteria for the definition of HMPA.</p> <p>The criteria mentioned are MTOM, maximum seat capacity and type of operations.</p> <p>The following definitions of HMPA are provided:</p> <ul style="list-style-type: none"> ▪ HMPA to exclude SEP below 2000kg MTOM; ▪ more than 2730kg MTOM; ▪ more than 2730kg MTOM, excluding amateur build and vintage aircraft; ▪ more than 3000kg MTOM and more than 10 passengers; ▪ More than 5700kg MTOM; ▪ Turbine powered and pressurized MEP; ▪ More than 15 tons MTOM and AOC operations.
89 113 599 731 992 1058 1074 1316 1557	Paul Draper Guy Charbonier Charles Neville EMF EAS DULV DaeC LAA-Czech Swiss Aviation Training	<p>These comments do not directly address the question. Some indications are however provided, namely:</p> <ul style="list-style-type: none"> ▪ that licences should only be issued for pilots involved in commercial activities; ▪ that definition of HMPA should be above European Airsports operations.

Question 10 a)

Analysis: An overwhelming majority of the stakeholders agrees that pilots of corporate and heavy motor-powered aircraft should hold an official licence.

The various suggestions presented by the stakeholders for the definition of heavy motor-powered aircraft indicate that it should be based on multiple criteria, taking into account the characteristics of the aircraft and the type of activity.

It is also worth indicating that several stakeholders disagree with the creation of a formal heavy motor-powered aircraft category.

Question 10 b)

b) Do stakeholders agree that powers should be given to the Commission to adopt implementing rules for the issuing of such licences?

Comment Number	From	Nature
54	CAA-Belgium	These commenters agree that powers should be given to the Commission to adopt implementing rules for the issuing of licences for pilots of corporate aviation and heavy motor-powered aircraft.
178	J.P. Meunier	
302	British Airways	
347	EHA	
393	AEA	
605	FNAM	
646	AOPA-UK	
702	SNPL	
766	Airbus	
1044	ENAC	
1097	ECOGAS	
1143	ECA	
1154	Austrocontrol	
1242	GAPAN-UK	
1265	EAAPS	
1281	ETF	
1290	Matthew Cunningham	
1342	CAA-Finland	
1412	FAA	
1451	Helicopter Club of GB	
1500	Austrian Ministry of Transport	
1522	GAMA	
1576	AOPA DK	
1592	CAA-Estonia	
1609	NACI	
1626	CAA-Poland	
1627	Belair	

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Comment Number	From	Nature
251 286 496 659 840	IBAC FOCA Bristow Helicopters Ltd German Ministry of Transport LBA	<p>These commenters agree that powers should be given to the Commission to adopt implementing rules for the issuing of licences for pilots of corporate aviation and heavy motor-powered aircraft, but make additional remarks, such as:</p> <ul style="list-style-type: none"> ▪ licences should be in accordance with ICAO Annex 1; ▪ the Commission should ensure common standards, to avoid “flag of convenience”; ▪ implementing rules should not hazard national PPL; ▪ implementing rules should provide for conversion of national licences and qualifications to EASA ones; ▪ implementing rules should cover only pilots of aircraft above 750kg MTOM.
89 149 1235 1317	Paul Draper RSA BGA LAA-Czech	<p>These comments do not clearly address the question, or had no comment.</p>

Question 10 b)

Analysis: An overwhelming majority of the stakeholders agrees that powers should be given to the Commission to adopt the implementing rules for the issuing of licences to pilots of corporate or heavy motor-powered aircraft.

Question 11 a)

a) Do stakeholders agree that pilots of light recreational or sport aircraft should not be required to hold an official licence? If so, what should be the definition of light recreational or sport aircraft?

Comment number	From	Nature
1168 1243 1266 1523 1545 1558 1626 1627	CAA-Sweden GAPAN EAAPS GAMA Dutch Ministry of Transport Swiss Aviation Training CAA-Poland Belair	These commenters agree that pilots of light recreational or sport aircraft should not be required to hold an official licence, but provide no definition of such aircraft.
90 98 105 138 360 432 551 600 624 755 773 865 1452 1510	Paul Draper GAAC Guy Charbonier PFA D. Kynatson Jörg Siedenburg John Holt Charles Neville AOPA-UK Ian G. Ellis Anthony John French J.R. Jones Helicopter Club of GB Robert Ross	These commenters agree that pilots of light recreational or sport aircraft should not be required to hold an official licence. Several definitions of light recreational or sport aircraft are provided: <ul style="list-style-type: none"> ▪ aircraft with MTOM below 450kg; ▪ aircraft with maximum MTOM of 1000kg, fixed undercarriage and maximum 4 seats capacity; ▪ aircraft with MTOM below 2000kg; ▪ aircraft with MTOM below 2000kg and maximum 3 pax seating capacity; ▪ aircraft with MTOM below 2730kg; ▪ aircraft with MTOM below 5000kg; ▪ aircraft with MTOM below 5700kg; ▪ aircraft with MTOM below 6500kg, SE.

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Comment number	From	Nature
993	EAS	<p>This commenter agrees that pilots of light recreational or sport aircraft should not be required to hold an official licence (considering that the definition of official licence equals ICAO Annex I compliant).</p> <p>The commenter emphasises that a sub-ICAO structure should be created for pilot licences for sports aircraft below 2730kg MTOM, issued by qualified bodies, with privileges limited to EU airspace. The requirements should achieve mutual acceptance in EU Member States.</p>
252 445 928	IBAC BAUA EHG&PU	<p>These commenters agree that pilots of light recreational or sport aircraft should not be required to hold an official licence, and propose to define light recreational or sport aircraft in accordance with paragraphs (e) and (f) of Annex II to the EASA Regulation.</p> <p>It is also added that the training of these pilots should be adequate.</p>
1291 1481 1575	Matthew Cunningham CATS AOPA-Denmark	<p>These commenters agree that pilots of light recreational or sport aircraft should not be required to hold an official licence, and proposes two definitions of light recreational or sport aircraft:</p> <ul style="list-style-type: none"> ▪ low mass airborne devices, e.g. micro-lights, gliders, balloons; ▪ non-powered flight.
185 150 177 303 346 394 495 634 660 703 841 767 776	EFC RSA J.P. Meunier British Airways EHA AEA Bristow Helicopters Ltd Andrew Nicoll German Ministry of Transport SNPL LBAs Airbus Christopher Tandy	<p>These commenters believe that pilots of light recreational or sport aircraft should be required to hold an official licence, but provide no definition of such aircraft.</p> <p>One comment and the FAA suggest that EASA should consider the FAA sport pilot certificate system.</p>

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Comment number	From	Nature
873 894 934 1011 1030 1045 1057 1073 1134 1154 1282 1318 1393 1413 1472 1501 1567 1593 1628	GASCO WE Blackledge Gerjo Hultink CAA-Norway CAA Denmark ENAC Italy DULV DAeC ECA Austrocontrol ETF LAA-Czech AeCS FAA Higherplane Aviation Training CAA Austria M. Northway CAA Estonia IAA	
4 55 73 261 287	David Pritt CAA-Belgium Timothy Natham Paul Hendry Smith FOCA	<p>These commenters believe that pilots of light recreational or sport aircraft should be required to hold an official licence, indicating that the definition of light recreational or sport aircraft should address the complexity as well as the size (weight) of the aircraft, and also take into account the activity, and not only the vehicle used.</p> <p>However, they emphasise that the requirements should be proportionate to the activity.</p>
205	CAA-UK	<p>This commenter believes that pilots of light recreational or sport aircraft should be required to hold an official licence, but emphasises that the UK currently exemptions should be retained for sport and recreational pilots.</p>

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Comment number	From	Nature
730 913 1098 1236 1610	EMF EGU ECOGAS BGA NACI	<p>These commenters believe that pilots of light recreational or sport aircraft should be required to hold an official licence. However, they propose to exclude several categories of aircraft, using weight and type of aircraft criteria. The types of aircraft proposed to be excluded were:</p> <ul style="list-style-type: none"> ▪ (powered) hang gliding and paragliding; ▪ light weight and foot launched microlights; ▪ low mass airborne devices, e.g. microlights, gliders and balloons. <p>According to the weight criteria, the following aircraft were proposed to be excluded:</p> <ul style="list-style-type: none"> ▪ Aircraft with less than 2730kg MTOM; ▪ Aircraft with less than 2000kg MTOM and SEP.
76 273	Prutech Innovation Services Michael Fortescue	These comments provided no answer to the question.

Question 11 a)

Analysis: The vast majority of stakeholders considers that pilots of recreational or sport aircraft should hold a licence.

Question 11 b)

b) Do stakeholders agree that pilots of recreational or sport aircraft should show compliance with the essential requirements to qualified bodies?

Comment number	From	Nature
55	CAA-Belgium	<p>These commenters agree that pilots of recreational or sport aircraft should show compliance with the Essential Requirements to qualified bodies.</p> <p>Some comments also add that licences issued by qualified bodies should be recognised throughout the EC.</p> <p>It was also emphasised by EAS that Germany and the UK have many years of successful experience using qualified bodies.</p>
90	Paul. Draper	
105	Guy Charbonier	
138	PFA	
150	RSA	
177	J.M. Meunier	
205	CAA-UK	
252	IBAC	
303	British Airways	
346	EHA	
360	D. Kynaston	
445	BAUA	
495	Bristow Helicopters Ltd.	
551	John Holt	
600	Charles Neville	
624	AOPA-UK	
634	Andrew Nicoll	
660	German Ministry of Transport	
703	SNPL	
730	EMF	
776	Christopher Tandy	
841	LBA	
865	J.R. Jones	
873	GASCO	
913	EGU	
993	EAS	
1011	CAA-Norway	
1030	CAA-Denmark	
1057	DULV	
1073	DAeC	
1098	ECOGAS	
1134	ECA	
1154	Austrocontrol	
1236	BGA	
1243	GAPAN	
1266	EAAPS	
1291	Matthew Cunningham	
1319	LAA-Czech	
1393	AeCS	
1413	FAA	

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Comment number	From	Nature
1452 1472 1501 1523 1545 1558 1575 1611 1626 1627	Helicopter Club of GB Higherplane Aviation Training Austrian Ministry of Transport GAMA Dutch Ministry of Transport Swiss Aviation Training AOPA-Denmark NACI CAA-Poland Belair	
287 394 767 928 1045 1168 1282 1343 1593 1628	FOCA AEA Airbus EHG&PU ENAC CAA-Sweden ETF CAA-Finland CAA-Estonia IAA	These commenters do not agree that pilots of recreational or sport aircraft should show compliance with the essential requirements to qualified bodies.
73 76 99 273 432	Timothy Nathan Prutech Innovation Services GAAC Michael Fortescue Dr. Jörg Siedenburg	These comments do not provide an answer to the question.

Question 11 b)

Analysis: The vast majority of stakeholders considers that pilots of recreational or sport aircraft show compliance with the essential requirements to qualified bodies.

Question 11 c)

c) Do stakeholders agree that powers should be given to the Commission to adopt implementing rules for the accreditation of such qualified bodies by national aviation authorities?

Comment number	From	Nature
55	CAA-Belgium	These commenters agree that powers should be given to the Commission to adopt implementing rules for the accreditation of such qualified bodies by NAAs. Some comments however mention that accreditation of qualified bodies should not necessarily be done by the NAAs: it could also be done by EASA.
76	Prutech Innovation Services	
90	Paul Draper	
150	RSA	
177	J.P. Meunier	
205	CAA-UK	
252	IBAC	
346	EHA	
445	BAUA	
495	Bristow Helicopters Ltd.	
551	John Holt	
600	Charles Neville	
730	EMF	
776	Christopher Tandy	
865	J.R. Jones	
873	GASCO	
913	EGU	
993	EAS	
1011	CAA-Norway	
1030	CAA-Denmark	
1098	ECOGAS	
1134	ECA	
1154	Austrocontrol	
1236	BGA	
1243	GAPAN-UK	
1266	EAAPS	
1291	Matthew Cunningham	
1393	AeCS	
1452	Helicopter Club of GB	
1501	Austrian Ministry of Transport	
1523	GAMA	
1558	Swiss Aviation Training	
1567	Mark Northway	
1575	AOPA-Denmark	
1612	NACI	
1626	CAA-Poland	
1627	Belair	

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Comment number	From	Nature
138 273 287 303 394 660 703 767 841 928 1057 1073 1168 1320 1343 1628	PFA Michael Fortescue FOCA British Airways AEA German Ministry of Transport SNPL Airbus LBA EHG&PU DULV DAeC CAA-Sweden LAA-Czech CAA-Finland IAA	These commenters do not agree that powers should be given to the Commission to adopt implementing rules for the accreditation of such qualified bodies by NAAs. Some believe that there is no need for common standards in this area. Others emphasise that compliance should only be shown to a NAA.
100 360 624 1413 1593 -	GAAC D. Kynaston AOPA-UK FAA CAA-Estonia DGAC-France	These comments do not provide an answer to the question. However, some added that they agreed that the competence for accreditation should remain with the NAAs.

Question 11 c)

Analysis: The majority also agrees that powers should be given to the Commission to adopt implementing rules for the accreditation of such qualified bodies by national aviation authorities. Some suggest that the Agency should also be entitled to accredit such bodies. Several stakeholders (mostly national aviation authorities) stated that national aviation authorities should be the only qualified bodies. However, it was also emphasized that at least two Member States have many years of successful experience using qualified bodies.

Question 12 a)

a) Do stakeholders agree that powers should be given to the Commission to adopt implementing rules on physical and medical fitness of pilots of corporate or heavy motor-powered aircraft?

Comment number	From	Nature
62	CAA-Belgium	These commenters agree that powers should be given to the Commission to adopt implementing rules on physical and medical fitness of pilots of corporate or heavy motor-powered aircraft.
91	Paul Draper	
114	Guy Charbonier	
206	CAA-UK	
253	IBAC	
288	FOCA	
304	British Airways	
345	EHA	
395	AEA	
446	BAUA	
494	Bristow Helicopters Ltd.	
552	John Holt	
601	Charles Neville	
606	FNAM	
625	AOPA-UK	
661	German Ministry of Transport	
704	SNPL	
768	Airbus	
842	LBA	
895	WE Blackledge	
1012	CAA-Norway	
1031	CAA-Denmark	
1046	ENAC	
1145	ECA	
1154	Austrocontrol	
1169	CAA-Sweden	
1244	GAPAN	
1267	EAAPS	
1283	ETF	
1292	Matthew Cunningham	
1344	CAA-Finland	
1394	AeCS	
1416	FAA	
1453	Helicopter Club of GB	
1502	Austrian Ministry of Transport	
1524	GAMA	
1544	Dutch Ministry of Transport	
1559	Swiss Aviation Training	
1574	AOPA-Denmark	

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Comment number	From	Nature
1594 1626 1627 1628	CAA-Estonia CAA-Poland Belair IAA	
183 264 274	J.P. Meunier Paul Hendry-Smith Michael Fortescue	These commenters do not agree that powers should be given to the Commission to adopt implementing rules on physical and medical fitness of pilots of corporate or heavy motor-powered aircraft.
134 151 184 729 874 914 929 994 1056 1072 1099 1237 1321 -	PFA RSA DAeC EMF GASCO EGU EHG&PU EAS DULV EFC ECOGAS BGA LAA-Czech DGAC-France	These comments do not provide an answer to the question.

Question 12 a)

Analysis: A vast majority of the stakeholders agrees that powers should be given to the Commission to adopt implementing rules on medical fitness of pilots of corporate or heavy motor-powered aircraft.

Question 12 b)

b) Do stakeholders agree that there is no need for implementing rules on physical and medical fitness of pilots of light recreational or sport aircraft?

Comment number	From	Nature
134 206 552 625 729 774 874 895 929 1012 1056 1072 1099 1244 1267 1322 1453 1502 1508 1511 1524 1544 1574 1594 1613 1627	PFA CAA-UK John Holt AOPA-UK EMF Christopher Tandy GASCO WE Blackledge EHG&PH CAA-Norway DULV DAeC ECOGAS GAPAN-UK EAAPS LAA-Czech Helicopter Club of GB Austrian Ministry of Transport CATS Robert Ross GAMA Dutch Ministry of Transport AOPA-Denmark CAA-Estonia NACI Belair	These commenters agree that there is no need for implementing rules on physical and medical fitness of pilots of light recreational or sport aircraft. CAA-UK mentioned that there is a need to define the category of light recreational or sport aircraft.
661 842 1169 1416	German Ministry of Transport LBA CAA-Sweden FAA	These commenters agree that there is no need for implementing rules on physical and medical fitness of pilots of light recreational or sport aircraft, provided that additional criteria are established, but limited to pilots of certain categories of aircraft, e.g.: <ul style="list-style-type: none"> ▪ aircraft below 750kg MTOM; ▪ gliders, paragliders, microlights and hang gliders; ▪ balloons.

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Comment number	From	Nature
62	CAA-Belgium	These commenters believe that there is a need for implementing rules on physical and medical fitness of pilots of light recreational or sport aircraft. Many consider however that such requirement should be adapted to the type of activity. In that context some suggest that the requirements should be equal to a car driving licence.
74	Timothy Nathan	
91	Paul Draper	
114	Guy Charbonier	
151	RSA	
183	J.P. Meunier	
253	IBAC	
288	FOCA	
304	Bristish Airways	
345	EHA	
358	D. Kynaston	
395	AEA	
446	BAUA	
494	Bristow Helicopters Ltd.	
601	Charles Neville	
637	Chris Barham	
704	SNPL	
768	Airbus	
914	EGU	
1031	CAA-Denmark	
1046	ENAC	
1135	ECA	
1154	Austrocontrol	
1237	BGA	
1283	ETF	
1292	Matthew Cunnigham	
1344	CAA-Finland	
1394	AeCS	
1469	Higherplane Aviation Training	
1559	Swiss Aviation Training	
1626	CAA-Poland	
1628	IAA	
-	DGAC-France	
274	Michael Fortescue	These comments do not answer the question.
606	FNAM	
994	EAS	

Question 12 b)

Analysis: *There is a slight majority of comments in favour of Community implementing rules on medical fitness for pilots of light recreational or sport aircraft, provided they are proportionate to the risk associated to the type of activity.*

Question 12 c)

c) Do stakeholders agree that powers should be given to the Commission to adopt implementing rules for the accreditation of aeromedical examiners by national aviation authorities?

Comment number	From	Nature
62	CAA-Belgium	These commenters agree that powers should be given to the Commission to adopt implementing rules for the accreditation of aero-medical examiners by national aviation authorities.
91	Paul Draper	
101	GAAC	
114	Guy Charbonier	
183	J.P. Meunier	
206	CAA-UK	
253	IBAC	
288	FOCA	
345	EHA	
446	BAUA	
494	Bristow Helicopters Ltd.	
552	John Holt	
601	Charles Neville	
625	AOPA-UK	
661	German Ministry of Transport	
704	SNPL	
743	FNAM	
768	Airbus	
842	LBA	
874	GASCO	
1012	CAA-Norway	
1031	CAA-Denmark	
1046	ENAC	
1099	ECOGAS	
1135	ECA	
1154	Austrocontrol	
1169	CAA-Sweden	
1244	GAPAN-UK	
1267	EAAPS	
1283	ETF	
1292	Matthew Cunningham	
1344	CAA-Finland	
1394	AeCS	
1416	FAA	
1453	Helicopter Club of GB	
1502	Austrian Ministry of Transport	
1524	GAMA	
1544	Dutch Ministry of Transport	
1559	Swiss Aviation Training	

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Comment number	From	Nature
1574 1594 1626 1627 1628 -	AOPA-Denmark CAA-Estonia CAA-Poland Belair IAA DGAC France	
151 304 395 929 994 1323	RSA British Airways AEA EHG&PU EAS LAA-Czech	These commenters do not agree that powers should be given to the Commission to adopt implementing rules for the accreditation of aero-medical examiners by national aviation authorities.
134 274	PFA Michael Fortescue	These commenters do not agree that powers should be given to the Commission to adopt implementing rules for the accreditation of aero-medical examiners by national aviation authorities, but only for pilots of light recreational and sport aircraft, for non-commercial and instructional flying.
729 914 1056 1072 1237 1614	EMF EGU DULV DAeC BGU NACI	These comments do not answer the question.

Question 12 c)

Analysis: A significant majority of stakeholders agrees that powers should be given to the Commission to adopt implementing rules for the accreditation of aero-medical examiners by national aviation authorities.

Question 13 a), b) and c)

- a) Do stakeholders agree that there should be implementing rules for commercial operations other than air transport?
- b) If not, do stakeholders consider more appropriate to apply the approach described here above to regulate these activities?
- c) In such a case, do stakeholders agree that powers should be given to the Commission to adopt implementing rules for the accreditation of qualified entities by national aviation authorities?

Comment number	From	Nature
63	CAA-Belgium	These commenters agree that there should be implementing rules for commercial operations other than air transport.
92	Paul Draper	
115	Guy Charbonnier	
152	RSA	
173	Eurocopter	
289	FOCA	
305	British Airways	
344	EHA	
396	AEA	
493	Bristow Helicopters Ltd	
602	Charles Neville	
607	FNAM	
626	AOPA-UK	
662	German Ministry of Transport	
705	SNPL	They do not favour the adoption of implementing rules for the accreditation of qualified entities.
769	Airbus	
843	LBA	
1013	CAA-Norway	
1032	CAA-Denmark	
1047	ENAC	
1136	ECA	
1154	Austrocontrol	
1170	CAA-Sweden	
1245	GAPAN-UK	
1268	EAAPS	
1284	ETF	
1345	CAA-Finland	
1503	Austrian Ministry of Transport	
1543	Dutch Ministry of Transport	
1595	CAA-Estonia	
1626	CAA-Poland	
1628	IAA	
-	DGAC France	

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Comment number	From	Nature
207 254 447 875 1100 1395 1417 1525 1627	CAA-UK IBAC BAUA GASCO ECOGAS AeCS FAA GAMA Belair	These commenters agree that there should be implementing rules for commercial operations other than air transport but believe that the Commission should be given the power to adopt these implementing rules for the accreditation of qualified entities by national aviation authorities.
135 275 728 1055 1071 1324 1454 1471 1560 1573	PFA Michael Fortescue EMF DULV DAeC LAA-Czech Helicopter Club of GB Higherplane Aviation Training Swiss Aviation Trainint AOPA-Denmark	These commenters would like these activities to be excluded and therefore regulated by Member States. One requested self-administration at industry level.
908 930 995 1238 1429 1512	EGU EHGPU EAS BGA NetJets Inc. Robert Ross	These comments did not express any views on this subject.

Question 13 a), b) and c)

Analysis: Most commenters consider that there should be implementing rules for commercial operations other than air transport. As a consequence they do not agree with the approach towards self-administration suggested in the consultation document. Conversely they see no need in giving the Commission powers to adopt implementing rules for the accreditation of qualified entities.

Question 14 a) and b)

- a) Do stakeholders agree that corporate aviation operations should be subject to the form of self regulation described in paragraph 34?
- b) In such a case, do stakeholders that powers should be given to the Commission to adopt implementing rules for the accreditation of qualified entities by national aviation authorities?

Comment number	From	Nature
172	Eurocopter	These commenters do not agree that corporate aviation operations should be subject to the form of self regulation suggested in the consultation document.
176	J.P. Meunier	
255	IBAC	Many suggest that implementing rules should draw from JAR-OPS 0 and JAR-OPS-2.
290	FOCA	
306	British Airways	
343	EHA	
397	AEA	
448	BAUA	
492	Bristow Helicopters Ltd.	
627	AOPA-UK	
663	German Ministry of Transport	
706	SNPL	
844	LBA	
876	GASCO	
1014	CAA-Norway	
1033	CAA-Denmark	
1048	ENAC	
1101	ECOGAS	
1137	ECA	
1154	Austrocontrol	
1171	CAA-Sweden	
1246	GAPAN-UK	
1268	EAAPS	
1285	ETF	
1346	CAA-Finland	
1418	FAA	
1504	Austrian Ministry of Transport	
1526	GAMA	
1542	Dutch Ministry of Transport	
1626	CAA-Poland	
1628	IAA	
-	DGAC-France	

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Comment number	From	Nature
93 109 603	Paul Draper Guy Charbonnier Charles Neville	These commenters agree that corporate aviation operations should be subject to the form of self regulation described in the Consultation Document. Fractional ownership should be regulated through IRs.
64 209 1572	CAA-Belgium CAA-UK AOPA-Denmark	These commenters agree that corporate aviation operations should be subject to the form of self regulation suggested in the Consultation Document. The Agency should be in charge of the accreditation of qualified entities.
608 1396 1455	FNAM AeCS Helicopter Club of GB	These commenters agree that corporate aviation operations should be subject to the form of self regulation suggested in the consultation document. Member States should be in charge of the accreditation of qualified entities.
276	Michael Fortescue	This commenter would like these activities to be excluded and therefore regulated by Member States.
136 153 727 916 931 996 1054 1070 1239 1327 1561 1596	PFA RSA EMF EGU EHG&PU EAS DULV DAeC BGA LAA-Czech Swiss Aviation Training CAA-Estonia	These comments do not express any views on this subject.

Question 14 a) and b)

***Analysis:** An overwhelming majority of commenters agree that corporate aviation operations should not be subject to the form of self regulation suggested in the consultation document. They therefore do not agree that power should be given to the Commission to adopt implementing rules for the accreditation of qualified entities by national aviation authorities to oversee corporate aviation operations. This also implies that this type of activity should be subject to appropriate implementing rules based on existing JAA material.*

Question 14 c)

c) Do stakeholders agree that general aviation and recreational activities should be directly subject to the essential requirements without the need for implementing rules, nor certification? If so, what should be the definition of general aviation?

Comment number	From	Nature
93	Paul Draper	These commenters agree that general aviation and recreational activities should be directly subject to the essential requirements without the need for implementing rules, nor certification.
109	Guy Charbonnier	
102	GAAC	
136	PFA	
153	RSA	
189	EFC	
255	IBAC	
343	EHA	
448	BAUA	
553	John Holt	
603	Charles Neville	
663	German Ministry of Transport	
727	EMF	
844	LBA	
876	GASCo	
916	EGU	
997	EAS	
1014	CAA-Norway	
1054	DULV	Some would like as definition of general aviation: Aircraft operating for non-commercial purposes and limited to aircraft with a MTOW
1070	DAeC	
1101	ECOGAS	
1239	BGA	
1246	GAPAN-UK	
1329	LAA-Czech	
1346	CAA-Finland	
1396	AeCS	
1455	Helicopter Club of GB	
1475	Scarfe	
1542	Dutch Ministry of Transport	Some feel that aircraft in Annex II of EASA Regulation should be excluded.
1572	AOPA-Denmark	
1596	CAA-Estonia	
1615	NACI	
		One commenter proposed to exclude large aircraft.

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Comment number	From	Nature
64 172 176 209 276 290 306 397 492 608 627 706 931 1033 1048 1137 1154 1171 1285 1418 1470 1504 1626 1628 -	CAA-Belgium Eurocopter J.P. Meunier CAA-UK Michael Fortescue FOCA British Airways AEA Bristow Helicopters Ltd FNAM AOPA-UK SNPL EHGPU CAA-Denmark ENAC ECA Austrocontrol CAA-Sweden ETF FAA Higherplane Aviation Training Austrian Ministry of Transport CAA Poland IAA DGAC-France	This group of stakeholders is in favour of having implementing rules for general aviation and recreational activities. One commenter requested self-administration at industry level. Most commenters proposed the ICAO definition for general aviation.
1526 1561	GAMA Swiss Aviation Training	This group of commenters do not express any views on this subject. One proposed the ICAO definition for general aviation.

Question 14 c)

Analysis: Most stakeholders agree that general aviation and recreational activities should be directly subject to the Essential Requirements without the need for implementing rules. Nevertheless, most of the NAA stakeholders prefer general aviation and recreational activities to be subject to implementing rules.

Most stakeholders recommend the use of the existing ICAO definition of general aviation.

Question 15 a)

a) Do stakeholders agree that cabin crew should hold a licence issued on the basis of common implementing rules adopted by the Commission?

Comment number	From	Nature
707 1015 1034 1049 1286 1397 1419 1562 1597 1627 -	SNPL CAA-Norway CAA-Denmark ENAC ETF AeCS FAA Swiss aviation training CAA-Estonia Belair DGAC-France	These comments consider the issuing of a licence as a normal consequence of the necessary training for this profession. The FAA, however, makes the difference between a certificate and a licence.
65 209 256 291 307 342 398 449 491 560 664 780 845 1085 1102 1154 1172 1248 1347 1456 1505 1541 1626 1628	CAA-Belgium CAA-UK IBAC FOCA British Airways EHA AEA BAUA Bristow Helicopters Ltd. IACA German Ministry of Transport Airbus LBA BMI ECOGAS Austrocontrol CAA-Sweden GAPAN-UK CAA-Finland Helicopter club of GB Austrian Ministry of Transport Dutch Ministry of Transport CAA-Poland IAA	While most of these comments consider that cabin crew should be subject to common requirements set at Community level, all consider that the issue of a licence is not required as they do not see any benefit with this additional administrative process.

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Comment number	From	Nature
137	PFA	These comments do not take a position as the question is not relevant to the activities they represent.
154	RSA	
609	FNAM	
726	EMF	
917	EGU	
932	EHG&PU	
1053	DULV	
1069	DAeC	
1240	BGA	
1331	LAA-Czech	

Question 15 a)

Analysis: There is an overwhelming majority of comments against the introduction of a licence for cabin crew but most commenters agree on the need for common rules related to the qualifications needed to exercise the related activities. The introduction of a licence could probably be seen as related more to political considerations than to safety ones.

Question 15 b)

b) Do stakeholders agree that flight dispatchers should hold a licence issued on the basis of common implementing rules adopted by the Commission?

Comment number	From	Nature
5 517 561 593 707 950 1015 1034 1049 1154 1286 1397 1419 1505 1562 1597 1626 1627	R.S. Biggart IFALDA IACA CAA-Greece SNPL I. Douvris CAA-Norway CAA-Denmark ENAC Austrocontrol ETF AeCS FAA Austrian Ministry of Transport Swiss aviation training CAA-Estonia CAA-Poland Belair	These comments consider the issuing of a licence as a normal consequence of the necessary training for this profession. Most insist on the fact that ICAO Annex I also foresees a licence for flight dispatchers.
65 209 256 291 307 342 398 449 491 609 664 780 845 1085 1102 1172 1248 1347 1456 1462 1541	CAA-Belgium CAA-UK IBAC FOCA British Airways EHA AEA BAUA Bristow Helicopters Ltd. FNAM German Ministry of Transport Airbus LBA BMI ECOGAS CAA-Sweden GAPAN-UK CAA-Finland Helicopter club of GB Easy Jet Dutch Ministry of Transport	While most of these comments consider that flight dispatch should be subject to common requirements set at Community level, all consider that the issue of a licence is not required as they do not see any benefit with this additional administrative process.

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Comment number	From	Nature
1628 -	IAA DGAC-France	
137 154 726 917 932 1053 1069 1240 133	PFA RSA EMF EGU EHG&PU DULV DAeC BGA LAA-Czech	These comments do not take a position as the question is not relevant to the activities they represent.

Question 15 b)

Analysis: *There is an overwhelming majority of comments against the introduction of a licence for flight dispatchers but most comments agree on the need for common rules related to the qualifications needed for the exercise of the related activities. The introduction of a licence could probably be seen as related more to political considerations than to safety ones.*