

INVENTORY OF ANSWERS

to the consultation document on the concept for better regulation in General Aviation (Aircraft other than Complex Motor Powered Aircraft used in Non-commercial activities)

Question 1

The Agency is interested in knowing the opinion of stakeholders on the general balance of the envisaged concept, as well as any suitable comment on its content not covered by the following questions.

Cmnt nr.	From	Nature
10 69 118 130 131 133 154 197 198 2705	G. Trömel Tony Halsall Trevor Sexton Kevin Taylor Bernd Hinkelmann Dr. Friedrich Renner Martyn Ingleton Aviation South West R. S. Bristowe Philippe Hendrickx	These stakeholders do not answer the question directly or the answer is unclear.
160 185 186 214 1019	PPL/IR Europe CAA Czech Republic CAA Denmark Austrocontrol Aeroclub Pnbram, Central Bohemia	These stakeholders are not in favour with the envisaged concept. They name some of the following items/reasons: <ul style="list-style-type: none"> - unbalanced concept - not suitable for aircraft up to 7500 kg MTOM - demand for deletion of some aircraft categories - no support for the Recreational Private Pilot Licence (RPPL) - missing definition for an assessment body - borderline between the categories (definition "non Complex")
	1612 persons with an identical response (see Annex 1 - list of commentators - question 1-1)	These stakeholders sent an identical response. They did not answer the question about their opinion on the envisaged concept. They are not satisfied with the use of the English language and the limited time of consultation for this A-NPA. They stated that due to these two reasons a major part of the European citizens couldn't take part the democratic procedure. Due to the very high number of duplicates, the names of these stakeholders are not listed in this Inventory of Answers. However, their names are contained in a separate file issued as part of the CRD.
3 7 176 190 225 259	Emil Pop Frank Thies Jiri Koubik Vitezslav Juricek Federation Française d'Aérostation AOPA Norway	These stakeholders did not answer the question about their opinion on the envisaged concept but mention issues which are related to General Aviation and not addressed by the A-NPA. Some of the mentioned aspects, which should be taken into account when regulating this field according to the stakeholders view, are: <ul style="list-style-type: none"> - the use of special airfield categories - the benefits of General Aviation (GA) for the community - burdensome costs and requirements - the use of self-regulation as a principle - EC regulations on insurance limits for aircrafts
1 3 11 16 17 22 25 29	Filippo de Florio Emil Pop Wilhelm Dirks Bernd Seeger ENAC Martin Feeg Royal Swedish Aero Club Peter Holy	These stakeholders did not answer the question about their opinion on the envisaged concept but they provide suitable comments on different subjects which are related to this concept of "Better regulation of General Aviation". Furthermore they emphasize certain aspects and propose to take them into account when regulating General Aviation some of the following items: <ul style="list-style-type: none"> - the need for a clear definition for "non-commercial" or "recreational operation"

31	SAMA	- flight against remuneration like passenger flights and flight training
35	Aero Club Milano	- definition of a complex aircraft
59	Walter Geßky	- the scope of the envisaged concept
60	Dt. Fliegerarztverband e.V.	- definition of General Aviation
61	Roger Hurley	- possible reduction of the medical requirements
63	Prof. Dr. Heino Falcke	- medical causes for accidents, causal factors, accident rate in GA
67	FRAeS Armageddon Associates	- operational rules for this kind of operation
79	CAA BELGIUM	- minimum equipment standards
80	Direction Gén. Transport Aérien	- licensing requirements (RPPL versus JAR FCL)
135	Volkmar Gessinger	- the use of assessment bodies and the oversight problem
136	Historic Aircraft Association	- the future role of the National Aviation Authorities
140	Patrick Walsh	- possible restrictions on airspace access (not accepted)
158	Joe Sullivan Beng	- continuous review of the requirements
161	P. van Ootmarsum	- national certification and airworthiness procedures/systems
174	Maurice Cronin	
175	Giovanni Lumia	
176	Jirí Koubik	
177	CZECH AIRCRAFT WORKS	
183	Horst Metzsig	
194	Luftfahrt-Bundesamt	
195	IAOPA Europe	
205	ESAM Society of Aerospace Med.	
207	Markus Hitter	
211	European Sailplane Manufacturers	
216	Bickerton's Aerodromes Ltd	
218	CAA Sweden	
224	GAMA Manufacturers Association	
233	Land und Forstflug GmbH	
237	AOPA UK	
245	Michael Dakin	
253	Federal Aviation Administration	
254	AOPA Switzerland	
259	AOPA Norway	
323	Flight Design GmbH	
890	Paola Scrigna	
896	Paolo Maurizio Sommariva	
898	Rodolfo Galli	
968	Antonio Carati	
990	Schempp-Hirth Aircraft manufact.	
1493	Tommaso Febbroni	
1494	Luca Salvadori	
1495	Dr. Paolo Ungaro	
1496	Stefano Galleni	
1497	Federico Vescarelli	
1498	Gianluca Iasci	
	528 persons with an identical response (see Annex 1 - list of commentators - question 1-2)	<p>These stakeholders sent an identical response. They did not answer the question about their opinion on the envisaged concept but provide suitable comments on different subjects. Some of the mentioned items / proposals are:</p> <ul style="list-style-type: none"> - relaxed maintenance and renewals of airworthiness - the necessity for a European PPL - medical examination without an Aero medical Examiner (AME) or an Aero medical Centre (AMC) - statistical proof for this proposal - EPPL with an Touring Motor Glider (TMG) rating for the glider licence - no airspace restrictions for EPPL pilots <p>Due to the very high number of duplicates, the names of these stakeholders are not listed in this Inventory of Answers. However, their names are contained in a separate file issued as part of the CRD.</p>
	134 persons with an identical response (see Annex 1 - list of commentators - question 1-3)	<p>These stakeholders sent an identical response. They did not answer the question about their opinion on the envisaged concept but provide additional general comments on the following issues:</p> <ul style="list-style-type: none"> - support of option 3 or option 1 for initial airworthiness - the need for a revision of Part-M with a strong emphasis on the self-regulating responsibilities - no more new regulation for operations is required

		<ul style="list-style-type: none"> - the current PPL requirements (JAR-FCL) have to be reviewed and simplified - the creation of a new Sports Licence (similar to the US LSA) for aircraft up to 750 kg MTOM is supported - permission of medical assessment by general practitioners <p>Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of Answers. However, their names are contained in a separate file issued as part of the CRD.</p>
	125 persons with an identical response (see Annex 1 - list of commentators - question 1-4)	<p>These stakeholders sent an identical response. They did not answer the question about their opinion on the envisaged concept but they give additional general comments on the following issues:</p> <ul style="list-style-type: none"> - the definition of complex and non-complex powered aircraft seems to be oversimplified but acceptable - demand for access to the airspace without restrictions - abolishment of JAR-FCL and JAR OPS for GA. - no creation of another licence but change of the existing scheme. <p>Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of Answers. However, their names are contained in a separate file issued as part of the CRD.</p>
	135 persons with an identical response (see Annex 1 - list of commentators - question 1-5)	<p>These stakeholders sent an identical response. They answered the question and described the actual situation for the operation of microlights in Italy. Furthermore they highlighted the following issues:</p> <ul style="list-style-type: none"> - the simplified regulatory regime in the “micro-light world” - the JAR regulations in contrast to that - the increase of complexity and costs without improvement in safety <p>Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of Answers. However, their names are contained in a separate file issued as part of the CRD.</p>
2 23 24 33 43 46 64 77 85 103 114 134 139 141 142 143 148 149 153 155 156 157 169 187 188 189 191 192 204 209 211 222 236 240	<p>Mike Godsell Motor Flying Union SWE / KSAK Helge Nielsen Philip Schamberger Eckard Glaser Pete Croney Experim. Aircraft Assoc. Sweden Johan Janda Nigel Hitchman CAA Netherlands Royal Danish Aeroclub Carlos Manuel Pires de Sousa British Microlight Aircraft Assoc. Graham Newby ALV Czech Republic Dr.Ingg.V.Pajno & M. Presotto Aero-Club of Switzerland Flylight Airsports ltd Johan Geerinck Ron Alexander Paul Collins Brian Johnson Julian Scarfe British Gliding Association British HG / Paragliding Assoc. Emmanuel S. Davidson Ben Syson Paul Handover STZ-AFL Aircraft Engines, BRP-ROTAX European Sailplane Manufacturers LAA SR John Tempest Light Aircraft Manufact. Assoc.</p>	<p>These stakeholders broadly support the principles of the envisaged concept. They mentioned the good general balance. Some of them provide further information about one of the following items:</p> <ul style="list-style-type: none"> - national requirements for the continuing airworthiness - certification of equipment - use of a simplified management system - cooperation with national aviation authorities - financial impact of the new concept - future possible change of Annex II

257	Danish Soaring Association	
265	Microlight Flying Magazine	
326	Danish Ultral. Flying Association	
752	Neil Broughton	
6	Roland Smolders	<p>These stakeholders broadly support the principles of the envisaged concept. Nevertheless they emphasize a need for further consideration on some of the following issues:</p> <ul style="list-style-type: none"> - further segmentation according to the MTOM - weight limits and regulations for VLA - more options for continuing airworthiness - the definition and borderline of recreational operation against commercial activities - replacement of the wording "recreational operation" with "Light aircraft operation" or "Private pilot operation" - airspace access for GA aircrafts - closer relation to the ICAO regulations - delegation of tasks / oversight NAA - implementation and use of safety management system - responsibility and liability problems - causal factors for accidents in GA - EC regulations on insurance limits for aircrafts
26	John Milner	
51	FFVV	
55	Dt. Ultraleichtflug-Verband e.V.	
56	Richard Meredith-Hardy	
58	Martin R. Knup	
62	Mike Chilvers	
65	Alberto Melis	
66	Air Sports Federation / AC Norway	
70	R. I. Hey	
72	Simon Baker	
76	Geoffrey Foster	
78	Paul Mahony	
83	Jean-Paul Van Zandycke	
86	UK CAA	
87	Klaus Fritz	
89	FIVU + FSIVA + AeCI + F-CAP	
91	Iniziativa Industriali Italiane Spa	
98	Werner Tamme	
103	CAA Netherlands	
142	ALV Czech Republic	
144	Enrico Forasacco	
147	Belgian Gliding Federation	
150	FIVV–Feder. Italiana Volo a Vela	
152	European Gliding Union	
158	Joe Sullivan Beng	
159	General Aviation Alliance (GAA)	
163	Federal Office of Civil Aviation	
167	Helicopter Club of Great Britain	
173	Diamond Aircraft Ind. GmbH	
179	ELSAMA (European LSA Manuf.)	
188	British HG and Paragliding Assoc.	
193	CAA Finland	
195	IAOPA Europe	
201	Tormod Veiby	
202	EADS SOCATA	
204	STZ-AFL	
208	Milan Mach	
217	OSTIV	
219	Swedish Soaring Federation	
226	Josef Straka	
228	German Aero Club	
237	AOPA UK	
250	Europe Air Sports	
251	ECOGAS	
255	Wolfgang S. Nitschmann	
263	Federation Francaise Aeronautique	
269	Flugsportzentrum Spitzerberg-ÖAC	
470	René Mühlmeier	
809	Achim Zurmühl	
853	Dr. Ing. Gero Dargel	
866	Franz Deters	
940	Ralph Mroczek	
976	Matthias Läßig	
980	Josef Hoffmann	
984	Julius Mlynář	
986	Venek Hudecek	
988	Milan Mrnušík	
991	Assoc. Air Operators of CR	
992	Zdenek Jurecek	
993	Martin Marecek	
994	LAA of the Czech Republic	
995	Tomáš Grufík	
1000	Vlastimil Ritter	
1007	Josef Vavřík	

1009 1010 1011 1013 1017 1856 1938 2234 2611 2707 2712 2713 2714 2715 2716	Aeromarine Jan Fridrich Jan Lukeš Dova Aircraft Jiri Holanec Seaplane Pilots Association Austria Ralf Gula AOPA Germany Réseau du Sport de l'Air B&F GmbH - FK-Leichtflugzeuge Leonhard Jochem Bertus Kühn Martin Ludwig Dt. Fallschirmsportverband e.V. Tobias Kretschmar	
	180 persons with an identical response (see Annex 1 - list of commentators - question 1-6)	These stakeholders sent an identical response. They express their opinion that the general balance of the prescribed concept gives cause for optimism. However the chance to fail is mentioned also. Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of Answers. However, their names are contained in a separate file issued as part of the CRD.
208 226 289 980 984 986 988 991 992 993 994 995 996 1000 1002 1007 1009 1010 1011 1013 1017	Milan Mach Josef Straka Lambert Aircraft Engineering bvba Josef Hoffmann Julius Mlynár Venek Hudecek Milan Mrnuščík Association of Air Operators of CR Zdenek Jurecek Martin Marecek Light Aircraft A. Czech Republic Tomáš Grufík Vít Kotek Vlastimil Ritter Petr Chvojka Josef Vavřík Aeromarine Jan Fridrich Jan Lukeš Dova Aircraft Jiri Holanec	These stakeholders broadly support the general balance of the prescribed concept. However the chance to fail is mentioned also. Some of them criticized the use of the English language as a problem for a democratic consultation. Others proposed to examine some of the existing national systems instead of creating a new concept.
86 140 177 247 325	UK CAA Patrick Walsh CZECH AIRCRAFT WORKS DGAC-France Belgian Paramotor Federation	These stakeholders broadly support the principles of the envisaged concept. Nevertheless they emphasize a need for further consideration on some of the following issues: - the use of English for the A-NPA - the use of special technical terms in the A-NPA - the time schedule of this A-NPA and the further consultation process - the EASA procedure to analyze and evaluate the A-NPA
	134 persons with an identical response (see Annex 1 - list of commentators - question 1-7)	These stakeholders sent an identical response for all 7 questions. They are in favour of most of the contents of the envisaged concept but nevertheless they are criticising a number of inconsistencies without naming them. Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD.

Analysis – Question 1

The majority of stakeholders did not answer the question about their opinion on the envisaged concept. Most of them provided information about their national systems for the regulation of General Aviation and suitable additional comments on the proposed concept.

A notable number of stakeholders expressed their support for the principles of the new concept and mentioned the good balance of the contents. Some of them however mentioned also a chance to fail for this concept. Most of them emphasized a need for further consideration on some of the mentioned subjects. A lot of stakeholders sent additional comments about subjects which were not covered in this A-NPA. They mentioned the:

- use of English for the NPA*
- use of special terms in the A-NPA*
- time schedule of this A-NPA and further consultations*
- EASA procedure of analysing and evaluating the NPA's*
- need for access of airspace without too much restrictions for General Aviation*
- implementation and use of safety management systems*
- need for a General Aviation “friendly” definition of “commercial” operations*

Only a very few stakeholders were not in favour of the envisaged concept for better regulation of General Aviation.

Question 2

The Agency is interested in knowing the opinion of stakeholders, in particular potential assessment bodies, on introducing the possibility for approved assessment bodies to issue and administer approvals, certificates or licences, as a means to relax the regulatory framework applicable to General Aviation. It is also interested by comments about having one-man assessment bodies similar to the American system of designees.

Cmnt nr.	From	Nature
248 253 650 990 1038 2176	Paul Watkins Federal Aviation Administration Laurie Hurman Schempp-Hirth Aircr. manufact. Féd. Franç. de Planeur Ultraleg. Österreichischer Aero Club	These stakeholders do not answer the question directly or the answer is unclear. Some of them provide additional information about items related to the use of assessment bodies.
1 23 25 31 45 46 55 56 58 61 62 64 65 67 69 72 76 77 78 82 83 84 87 89 91 92 93 94 98 99 101 103 104 108 114 130 134 136 139 140 141 142 147 148 150	Filippo de Florio Motor Flying Union SWE / KSAK Royal Swedish Aero Club SAMA APAU Pete Cronney Dt. Ultraleichtflug-Verband e.V. Richard Meredith-Hardy Martin R. Knup Roger Hurley Mike Chilvers Experimental Aircraft Assoc. SWE Alberto Melis FRAeS Armaggedon Associates Tony Halsall Simon Baker Geoffrey Foster Johan Janda Paul Mahony David Daniel Jean-Paul Van Zandycke DONATI Klaus Fritz FIVU + FSIVA + AeCI + F-CAP Iniziativa Industr. Italiane Spa Mauro Roderi Ian Smith SPACECONNECT NV Werner Tamme FIVU – Fed. Italiana Volo Ultral. Flavio Giacosa CAA Netherlands T.P. Cripps Kevin Armstrong Royal Danish Aeroclub Kevin Taylor Carlos Manuel Pires de Sousa Historic Aircraft Association British Microlight Aircraft Ass. Patrick Walsh Graham Newby ALV Czech Republic Belgian Gliding Federation Aero-Club of Switzerland FIVV –Fed. Italiana Volo a Vela	These stakeholders broadly support the concept of assessment bodies without any restriction. Some of them described detailed examples of existing assessment bodies and their tasks.

152	European Gliding Union	
153	Johan Geerinck	
159	General Aviation Alliance (GAA)	
167	Helicopter Club of Great Britain	
179	ELSAMA	
192	Paul Handover	
204	STZ-AFL	
208	Milan Mach	
209	Aircraft Engines, BRP-ROTAX	
211	European Sailplane Manufacturers	
217	OSTIV	
219	Swedish Soaring Federation	
222	LAA SR	
225	Federation Française d'Aérost.	
226	Josef Straka	
228	German Aero Club	
236	John Tempest	
250	Europe Air Sports	
251	ECOGAS	
255	Wolfgang S. Nitschmann	
257	Danish Soaring Association	
265	Microlight Flying Magazine	
322	Gareth Jones	
323	Flight Design GmbH	
326	Danish Ultralight Flying Ass.	
470	René Mühlmeier	
809	Achim Zurmühl	
853	Dr. Ing. Gero Dargel	
866	Franz Deters	
940	Ralph Mroczek	
976	Matthias Läßig	
980	Josef Hoffmann	
984	Julius Mlynár	
986	Venek Hudecek	
988	Milan Mrnuštk	
991	Association of Air Operators CR	
992	Zdenek Jurecek	
993	Martin Marecek	
994	Light Aircraft Association CR	
995	Tomáš Grufik	
996	Vít Kotek	
1000	Vlastimil Ritter	
1002	Petr Chvojka	
1007	Josef Vavřík	
1009	Aeromarine	
1010	Jan Fridrich	
1011	Jan Lukeš	
1013	Dova Aircraft	
1017	Jiri Holanec	
1019	AC Příbram, Central Bohemia	
1938	Ralf Gula	
2234	AOPA Germany	
2705	Philippe Hendrickx	
2707	B&F GmbH - FK-Leichtflugzeuge	
2712	Leonhard Jochem	
2713	Bertus Kühn	
2714	Martin Ludwig	
2715	Dt. Fallschirmsportverband e.V.	
2716	Tobias Kretschmar	
11	Wilhelm Dirks	<p>These stakeholders agree with the concept of assessment bodies but they mention either the restriction for a special task (e.g. licensing) or they describe several limiting factors or provisions for this concept like:</p> <ul style="list-style-type: none"> - the implementation procedures - the oversight by the member states / National Aviation Authorities - minimum quality standards / standardisation of the assessment bodies - limitation for special tasks like initial airworthiness / licensing - liability and insurance problems
17	ENAC	
51	FFVV	
59	Walter Geßky	
66	Air Sports Federation/AC Norway	
70	R. I. Hey	
80	Direct. Générale Transport Aérien	
85	Nigel Hitchman	
86	UK CAA	
160	PPL/IR Europe	

163 177 193 194 195 214 218 221 224 237 240 247 254 263 2611	Federal Office of Civil Aviation CZECH AIRCRAFT WORKS CAA Finland Luftfahrt-Bundesamt IAOPA Europe Austrocontrol CAA Sweden CAA Norway GA Manufacturer Association AOPA UK Light Aircraft Manuf. Assoc. DGAC-France AOPA Switzerland Federation Francaise Aeronautique Réseau du Sport de l'Air	- service continuity - organisational structure and economic implications
46 56 61 62 64 65 66 67 72 76 77 78 89 91 108 114 130 140 148 153 265 326 1010 1019 1938 2705	Pete Crony Richard Meredith-Hardy Roger Hurley Mike Chilvers Experimental Aircraft Assoc. SWE Alberto Melis Air Sports Federation/AC Norway FRaES Armageddon Associates Simon Baker Geoffrey Foster Johan Janda Paul Mahony FIVU + FSIVA + AeCI + F-CAP Iniziativa Industr. Italiana Spa Kevin Armstrong Royal Danish Aeroclub Kevin Taylor Patrick Walsh Aero-Club of Switzerland Johan Geerinck Microlight Flying Magazine Danish Ultralight Flying Assoc. Jan Fridrich AC Příbram, Central Bohemia Ralf Gula Philippe Hendrickx	These stakeholders are in favour with the concept of a one-man assessment body without any restriction.
2 23 25 31 45 69 70 83 84 85 92 93 94 99 101 104 134 136 139 142 150 152 159 160 167 179 204	Mike Godsell Motor Flying Union SWE / KSAK Royal Swedish Aero Club SAMA APAU Tony Halsall R. I. Hey Jean-Paul Van Zandycke DONATI Nigel Hitchman Mauro Roderi Ian Smith SPACECONNECT NV FIVU – Fed. Italiana Volo Ultral. Flavio Giacosa T.P. Cripps Carlos Manuel Pires de Sousa Historic Aircraft Association British Microlight Aircraft Assoc. ALV Czech Republic (ALV CR) FIVV –Fed. Italiana Volo a Vela European Gliding Union General Aviation Alliance (GAA) PPL/IR Europe Helicopter Club of Great Britain ELSAMA STZ-AFL	These stakeholders support the concept of a one-man assessment body. Some of them stated that the competence of such a “one man” organisation should be limited to a very specific scope and propose to use them only for special tasks like airworthiness or licensing. Some others mentioned the American system of designees as a safe and effective system.

228 236 247 250 251 322 323 2070 2707	German Aero Club John Tempest DGAC-France Europe Air Sports ECOGAS Gareth Jones Flight Design GmbH Guiliano Dallochio B&F GmbH - FK-Leichtflugzeuge	
158 173 1115	Joe Sullivan Beng Diamond Aircraft Ind. GmbH Malta Department of Civil Aviation	These stakeholders do not agree with the concept of assessment bodies at all.
80 103 163 193 209	Direction Gén. Transport Aérien CAA Netherlands Federal Office of Civil Aviation CAA Finland Aircraft Engines, BRP-ROTAX	These stakeholders do not agree with the concept of a one-man assessment body.
185 202	CAA Czech Republic EADS SOCATA	These stakeholders do not agree with the concept of assessment bodies but with the concept of one man assessment bodies under certain circumstances.
	180 persons with an identical response (see Annex 2 - list of commentators-question 2-1)	These persons / organisations sent an identical response. They agree with the concept of assessment bodies without any restriction. Furthermore they broadly support the concept of one – man assessment bodies. Due to the high number of duplicates, the names of these persons/organisations are not listed in this Inventory of Answers. However their names are contained in a separate file issued as part of the CRD.
	134 persons with an identical response (see Annex 2 - list of commentators-question 2-2)	These persons / organisations sent an identical response for all 7 questions. They agree with the concept of assessment bodies and with the concept of "one-man" assessment bodies without any further comment. Due to the high number of duplicates the names are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD.

Analysis – Question 2

The vast majority of stakeholders found it feasible in principle to develop a concept of assessment bodies without any restriction of tasks. Most of the stakeholders also accept the idea of a “one man” assessment body. Only a few stakeholders wanted to see the tasks of these assessment bodies limited to special areas such as airworthiness or licensing. In addition they mentioned several issues to be considered before implementation.

Only a minority of stakeholders including 5 National Aviation Authorities did not agree with the concept of assessment bodies or “one-man” assessment bodies at all.

Question 3

The Agency is interested in knowing the opinion of stakeholders on which of the options described here above they think is the most suitable for regulating General Aviation initial airworthiness. In such a context comments on the weight limits envisaged are welcome.

Cmnt nr.	From	Nature
48 69 80 86 88 192 257 2176	Gary Miller Tony Halsall Direction Gén. Transport Aérien UK CAA Limbach Flugmotoren GmbH Paul Handover Danish Soaring Association Österreichischer Aero Club	These comments do not address the question or are unclear.
59 147 160 163 173 176 177 188 194 202 207 208 217 220 226 233 240 246 247 289 964 980 984 986 988 991 992 993 994 995 996 1000 1002 1007 1009 1010 1011 1013 1017 1019 2265 2295 2611 2646 2706 2708	Walter Geßky Belgian Gliding Federation PPL/IR Europe Federal Office of Civil Aviation Diamond Aircraft Ind. GmbH Jiri Koubik CZECH AIRCRAFT WORKS British Hangglid. Paragliding A. Luftfahrt-Bundesamt EADS SOCATA Markus Hitter Milan Mach OSTIV Dirk Krappel Josef Straka Land und Forstflug GmbH Light Aircraft Manufact.Assoc. René Fournier DGAC-France Lambert Aircraft Engineering Klaus Ohlenhardt Josef Hoffmann Julius Mlynár Venek Hudecek Milan Mrnuščík Associat. of Air Operators of CR Zdenek Jurecek Martin Marecek Light Aircraft Association CZ Tomáš Grufík Vít Kotek Vlastimil Ritter Petr Chvojka Josef Vavřík Aeromarine Jan Fridrich Jan Lukeš Dova Aircraft Jiri Holanec AC Příbram, Central Bohemia Christoph Schmidt Jürgen Krämer Réseau du Sport de l'Air Hubert Raaf Jan Bodenheim Hartmut Haag	These stakeholders answer the question, and provide additional information.

1 17 44	Filippo de Florio ENAC Peter Morris	These stakeholders propose not to change Part-21 except insofar as to allow the introduction of an LSA category implying a maximum mass of 600kg.
1	Filippo de Florio	This stakeholder does not propose simplification of the system but advocates the use of DOA and emphasize the importance of proximity activities.
1 70 86 151 163 194 209 253	Filippo de Florio R. I. Hey UK CAA OMA SUD Sky Technologies Federal Office of Civil Aviation Luftfahrt-Bundesamt Aircraft Engines, BRP-ROTAX Federal Aviation Administration	These stakeholders do not support the creation of one-man DOA for the more complex projects but propose to create AMC to address the case of DOA for small organisations.
17 23 59 64 66 80 160 163 185 193 194 195 202 206 217 218 220 228 237 246 247 250 263 2611	ENAC Motor Flying U./Royal SWE AC Walter Geßky Experimental Aircraft A. SWE Air Sports Fed. / AC Norway Direction Gén. Transport Aérien PPL/IR Europe Federal Office of Civil Aviation CAA Czech Republic CAA Finland Luftfahrt-Bundesamt IAOPA Europe EADS SOCATA EUROCOPTER OSTIV CAA Sweden Dirk Krappel German Aero Club AOPA UK René Fournier DGAC-France Europe Air Sports Federation Franc. Aeronautique Réseau du Sport de l'Air	These stakeholders support option 1.
17 59 189	ENAC Walter Geßky Emmanuel S. Davidson	These stakeholders support option 1 with the introduction of an LSA category with a maximum weight of 600kg.
25 77 88 134 142 153 167 176 188 204 208 211 226 980 984 986 988 990 991 992 993 994 995 996 1000	Royal Swedish Aero Club Johan Janda Limbach Flugmotoren GmbH Carlos Manuel Pires de Sousa A. of Aviation Manufacturers CZ Johan Geerinck Helicopter Club of Great Britain Jiri Koubik British Hanggliding and Paragl. A. STZ-AFL Milan Mach European Sailplane Manufacturers Josef Straka Josef Hoffmann Julius Mlynár Venek Hudecek Milan Mrnuščík Schempp-Hirth Aircraft manuf. Associat. of Air Operators of CR Zdenek Jurecek Martin Marecek Light Aircraft Association CZ Tomáš Grufík Vít Kotek Vlastimil Ritter	These stakeholders support option 2.

1002 1007 1009 1010 1011 1013 1017 2705	Petr Chvojka Josef Vavřík Aeromarine Jan Fridrich Jan Lukeš Dova Aircraft Jiri Holanec Philippe Hendrickx	
31 46 51 55 56 58 61 62 72 76 78 83 87 98 108 130 139 140 147 149 155 157 179 191 201 211 224 236 240 255 263 265 289 323 470 650 809 853 866 940 976 1019 1938 2070 2234 2707 2712 2713 2714 2715 2716	SAMA Pete Crony FFVV Dt. Ultraleichtflug-Verband e.V. Richard Meredith-Hardy Martin R. Knup Roger Hurley Mike Chilvers Simon Baker Geoffrey Foster Paul Mahony Jean-Paul Van Zandycke Klaus Fritz Werner Tamme Kevin Armstrong Kevin Taylor British Microlight Aircraft Ass. Patrick Walsh Belgian Gliding Federation Flylight Airsports ltd Ron Alexander Brian Johnson ELSAMA Ben Syson Tormod Veiby European Sailplane Manufacturers GA Manufacturers Association John Tempest Light Aircraft Manufacturers A. Wolfgang S. Nitschmann Federation Franc. Aeronautique Microlight Flying Magazine Lambert Aircraft Engineering Flight Design GmbH René Mühlmeier Laurie Hurman Achim Zurmühl Dr. Ing. Gero Dargel Franz Deters Ralph Mroczek Matthias Läßig AC Příbram, Central Bohemia Ralf Gula Guiliano Dallochio AOPA Germany B&F GmbH - FK-Leichtflugzeuge Leonhard Jochem Bertus Kühn Martin Ludwig Dt. Fallschirmsportverband e.V. Tobias Kretschmar	These stakeholders support Option 3.
	187 persons / organisations with an identical response (Annex 3 - list of commentators – question 3-1)	These persons / organisations sent an identical response. They support Option 3. Due to the high number of duplicates these stakeholders are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD.
	About 134 persons / organisations with an identical response (Annex 3 - list of commentators –	These stakeholders sent an identical response for all 7 questions. They support Option 3 (Option 1 would also be beneficial, for aircraft above 2000 kg).

	question 3-2)	Due to the high number of duplicates these stakeholders are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD.
65 85 89 91 114 141 148 150 151 152 159 187 219 251	Alberto Melis Nigel Hitchman FIVU + FSIVA + AeCI + F-CAP Iniziative Industriali Italiane Spa Royal Danish Aeroclub Graham Newby Aero-Club of Switzerland FIVV –Fed. Italiana Volo a Vela OMA SUD Sky Technologies European Gliding Union General Aviation Alliance (GAA) British Gliding Association Swedish Soaring Federation ECOGAS	These stakeholders support option 3 in the long term and option 1 in the short term.
11	Wilhelm Dirks	This stakeholder supports option 3 with a maximum mass of 1000kg and the use of certification specifications.
67 136	FRAeS Armaggedon Associates Historic Aircraft Association	These stakeholders support option 1 above 2000kg, option 2 between 750 and 2000 kg and option 3 below 750kg
207 2611	Markus Hitter Réseau du Sport de l'Air	These stakeholders propose a mix of options.
43	Eckard Glaser	This stakeholder proposes to introduce two new categories: one comparable to LSA with a 600kg maximum mass; one with a maximum mass of 1200kg.
51 59 86 139 147 152 204 209 211 217 237 323 990	FFVV Walter Geßky UK CAA British Microlight Aircraft Ass. Belgian Gliding Federation European Gliding Union STZ-AFL Aircraft Engines, BRP-ROTAX European Sailplane Manufacturers OSTIV AOPA UK Flight Design GmbH Schempp-Hirth Aircraft manufact.	These stakeholders support the use of industry standards in the context of option 2 and 3.
86	UK CAA	This stakeholder provides comments on the Regulatory Impact Assessment and is concerned about the potential increase of risk in option 1 to 3 and does not advocate changes.
86 159	UK CAA General Aviation Alliance (GAA)	These stakeholders do not support industry standards.
86	UK CAA	This stakeholder believes that the benefit of deregulation is overstated. Furthermore this National Aviation Authority is concerned by the liability aspects of the proposals included in the A-NPA and by the consistency of the A-NPA proposals with ICAO.
147 195 224 237	Belgian Gliding Federation IAOPA Europe General Aviation Manufact. A. AOPA UK	These stakeholders support a one man DOA.
59 177 208 222 226 980 984	Walter Geßky CZECH AIRCRAFT WORKS Milan Mach LAA SR Josef Straka Josef Hoffmann Julius Mlynár	These stakeholders propose to create a category comparable to LSA.

986 988 991 992 993 994 995 996 1000 1002 1007 1009 1010 1011 1013 1017	Venek Hudecek Milan Mrnuštk Associat. of Air Operators of CR Zdenek Jurecek Martin Marecek Light Aircraft Association of CZ Tomáš Grufík Vít Kotek Vlastimil Ritter Petr Chvojka Josef Vavřík Aeromarine Jan Fridrich Jan Lukeš Dova Aircraft Jiri Holanec	
964 1995 2265 2295 2646 2706 2708	Klaus Ohlenhardt Gunther Butterweck Christoph Schmidt Jürgen Krämer Hubert Raaf Jan Bodenheim Hartmut Haag	These stakeholders propose simplified regulations for aircraft defined by power and mass limits.
2611	Réseau du Sport de l'Air	These stakeholders raise additional questions relative e.g. to the mass limits.

Analysis – Question 3

The vast majority of stakeholders is supporting either option 2 (Industry monitoring) or option 3 (Industry monitoring with self certification). Some of the stakeholders supporting option 3 were also supporting option 1 (relaxation of the current system) for aircraft above 2000 kg where the Agency had proposed no changes to Part-21. Some other stakeholders supporting option 3 were considering it more for the long term and would support option 1 in return.

A number of stakeholders proposed the creation of a category comparable to the US light Sport Aircraft rule.

Other stakeholders (including many National Authorities) supported the use of option 1.

Some stakeholders proposed simplified regulations for aircraft using power and weight limits as criteria.

One National Authority was concerned by the potential increase of risk in adopting either of the options 1 to 3 and did not advocate changes.

Mixed views were expressed on the one-man DOA or DER.

Concerning weight criteria, the stakeholders were almost unanimous in accepting an upper limit of 2000 kg for the relaxation of the present system of Part-21. The comments received regarding a weight limit below which a very simple certification process would be acceptable shows no such unanimity. The upper boundary of these suggestions was generally 850 kg (powered sailplanes). Other suggestions supported the A-NPA proposal of 750 kg (Sailplanes and very light Aeroplanes) whilst some stakeholders suggested 600 kg to be consistent with the FAA LSA category.

Question 4

The agency is interested in knowing the opinion of stakeholders on the following points:

- a) Should assessment bodies be involved in the oversight of continuing airworthiness, such as ARC s renewal;*
- b) What should be the role of NAAs in this field?*
- c) Should continuing airworthiness requirements be adapted to the size/type of aircraft? How should this be done?*
- d) Is it worth developing standards modifications and repairs that could be embodied without the need for further approvals? Which bodies should do so?*
- f) Is it possible to develop Industry Standards to be used in continuing airworthiness processes? Which bodies should be in charge?*

Cmnt nr.	From	Nature
11 134	Wilhelm Dirks Carlos Manuel Pires de Sousa	These stakeholders answer the question, and provide additional information.
	134 persons with an identical response (Annex 4 - list of commentators – question 4-1)	These stakeholders sent an identical response for all 7 questions. They support the involvement of assessment bodies in the oversight of continuing airworthiness and propose no or a minimal role for the NAAs. They expressed doubts to the practicability of developing standard modifications or repairs and proposed that industry standards are developed by other organisations (e.g. associations, standardisation bodies). They do not agree that continuing airworthiness requirements should be adapted to the size or type of aircraft and propose other criteria. Due to the high number of duplicates these stakeholders are not listed in this inventory of answers. However their names are contained in a separate file issued as a part of the CRD.
	192 persons with an identical response (Annex 4 - list of commentators - question 4-2)	These stakeholders sent an identical response. They support the involvement of assessment bodies in the oversight of continuing airworthiness and propose no or a minimal role for the NAAs. They believe that continuing airworthiness requirements should be adapted to the size/ type of aircraft and they support the development of standard modification and repairs by either the TC holder or assessment bodies. Furthermore these persons/organisations support the development of industry standards for continuing airworthiness and propose that these standards are developed by assessment bodies. Due to the high number of duplicates these stakeholders are not listed in this inventory of answers. However their names are contained in a separate file issued as a part of the CRD.
	20 persons with an identical response (Annex 4 - list of commentators – question 4-3)	These stakeholders sent an identical response. They support the involvement of assessment bodies in the oversight of continuing airworthiness and propose no or a minimal role for the NAAs. They believe that continuing airworthiness requirements should be adapted to the size/ type of aircraft und support the development of standard modification and repairs by either the TC holder or assessment bodies. Furthermore they propose that industry standards are developed by assessment bodies. These stakeholders are not listed in this inventory of answers. However their names are contained in a separate file issued as a part of the CRD.
2 23 25 31 46 51 55	Mike Godsell Motor Flying Union Sweden Royal Aero Club SWE SAMA Pete Cronney FFVV Dt. Ultraleichtflug-Verband e.V.	These stakeholders support the involvement of assessment bodies in the oversight of continuing airworthiness.

58	Martin R. Knup	
61	Roger Hurley	
65	Alberto Melis	
66	Norwegian AS Federation / AC	
67	FRAeS Armageddon Associates	
70	R. I. Hey	
77	Johan Janda	
78	Paul Mahony	
80	Direction Gén. Transport Aérien	
85	Nigel Hitchman	
87	Klaus Fritz	
89	FIVU + FSIVA + AeCI + F-CAP	
91	Iniziative Industriali Italiane Spa	
98	Werner Tamme	
108	Kevin Armstrong	
114	Royal Danish Aeroclub	
130	Kevin Taylor	
134	Carlos Manuel Pires de Sousa	
136	Historic Aircraft Association	
138	Erich Daum	
139	British Microlight Aircraft Ass.	
140	Patrick Walsh	
141	Graham Newby	
142	Ass.of Aviation Manuf. CZ	
147	Belgian Gliding Federation	
148	Aero-Club of Switzerland	
150	FIVV –Federazione Italiana Volo	
152	European Gliding Union	
153	Johan Geerinck	
155	Ron Alexander	
156	Paul Collins	
157	Brian Johnson	
159	General Aviation Alliance (GAA)	
167	Helicopter Club of Great Britain	
176	Jiri Koubik	
179	ELSAMA	
187	British Gliding Association	
188	British Hanggliding Parag. Ass.	
189	Emmanuel S. Davidson	
203	CAA Belgium, Cert. Dept.	
209	Aircraft Engines, BRP-ROTAX	
219	Swedish Soaring Federation	
222	LAA SR	
225	Fed. Française d'Aérostation	
228	German Aero Club	
236	John Tempest	
240	Light Aircraft Manuf. Association	
250	Europe Air Sports	
251	ECOGAS	
254	AOPA Switzerland	
255	Wolfgang S. Nitschmann	
257	Danish Soaring Association	
263	Federation Francaise Aeronaut.	
265	Microlight Flying Magazine	
289	Lambert Aircraft Engineering	
323	Flight Design GmbH	
470	René Mühlmeier	
809	Achim Zurmühl	
853	Dr. Ing. Gero Dargel	
866	Franz Deters	
940	Ralph Mroczek	
976	Matthias Läßig	
990	Schempp-Hirth Aircraft manuf.	
1019	Aeroclub Příbram, C. Bohemia	
1938	Ralf Gula	
2176	Österreichischer Aero Club	
2234	AOPA Germany	
2705	Philippe Hendrickx	
2707	B&F GmbH - FK-Leichtflugz.	
2709	P. A. Doyle	

2712 2713 2714 2715 2716	Leonhard Jochem Bertus Kühn Martin Ludwig Dt. Fallschirmsportverband e.V. Tobias Kretschmar	
59 64 86 103 163 185 202 206 218 220 1038 2611	Walter Geßky Experimental Aircraft Ass. SWE UK CAA CAA Netherlands Federal Office of Civil Aviation CAA Czech Republic EADS SOCATA Eurocopter CAA Sweden Dirk Krappel Fédérat. Franç. Planeur Ultral. Réseau du Sport de l'Air	These stakeholders do not support the involvement of assessment bodies in the oversight of continuing airworthiness.
2 23 25 28 31 46 51 55 58 65 66 67 70 77 78 85 87 89 91 98 114 130 136 139 140 141 142 147 148 150 152 153 155 156 157 159 160 179 187 189 193 202 207 219 222 225 228 236 240 250 251	Mike Godsell Motor Flying Union Sweden Royal Swedish Aero Club Tom Wade SAMA Pete Croney FFVV Dt. Ultraleichtflug-Verband e.V. Martin R. Knup Alberto Melis Air Sports Fed. / AC Norway FRAeS Armageddon Associates R. I. Hey Johan Janda Paul Mahony Nigel Hitchman Klaus Fritz FIVU + FSIVA + AeCI + F-CAP Iniziativa Industriali Italiane Spa Werner Tamme Royal Danish Aeroclub Kevin Taylor Historic Aircraft Association British Microlight Aircraft Ass. Patrick Walsh Graham Newby Ass. of Aviation Manuf. CZ Belgian Gliding Federation Aero-Club of Switzerland FIVV – Fed. Italiana Volo a Vela European Gliding Union Johan Geerinck Ron Alexander Paul Collins Brian Johnson General Aviation Alliance (GAA) PPL/IR Europe ELSAMA British Gliding Association Emmanuel S. Davidson CAA Finland EADS SOCATA Markus Hitter Swedish Soaring Federation LAA SR Federation Française d'Aérost. German Aero Club John Tempest Light Aircraft Manufacturers Ass. Europe Air Sports ECOGAS	These stakeholders propose no or a minimal role for NAA in the oversight of continuing airworthiness.

254 255 257 265 289 323 470 809 853 866 940 976 990 1938 2234 2705 2707 2712 2713 2714 2715 2716	AOPA Switzerland Wolfgang S. Nitschmann Danish Soaring Association Microlight Flying Magazine Lambert Aircraft Engineering Flight Design GmbH René Mühlmeier Achim Zurmühl Dr. Ing. Gero Dargel Franz Deters Ralph Mroczek Matthias Läßig Schempp-Hirth Aircraft manuf. Ralf Gula AOPA Germany Philippe Hendrickx B&F GmbH - FK-Leichtflugz. Leonhard Jochem Bertus Kühn Martin Ludwig Dt. Fallschirmsportverband e.V. Tobias Kretschmar	
11 59 64 86 103 108 167 185 203 206 209 214 218 220 2176 2611 2709	Wilhelm Dirks Walter Geßky Experimental Aircraft A. Sweden UK CAA CAA Netherlands Kevin Armstrong Helicopter Club of Great Britain CAA Czech Republic CAA Belgium, Cert. Dept. EUROCOPTER Aircraft Engines, BRP-ROTAX Austrocontrol CAA Sweden Dirk Krappel Österreichischer Aero Club Réseau du Sport de l'Air P. A. Doyle	These stakeholders support an involvement of the NAA into the oversight of continuing airworthiness.
2 11 23 25 31 43 46 51 55 58 59 64 65 66 67 70 77 78 85 86 87 89 91 98 108 114 130 134	Mike Godsell Wilhelm Dirks Motor Flying U. Sweden / KSAK Royal Swedish Aero Club SAMA Eckard Glaser Pete Croney FFVV Dt. Ultraleichtflug-Verband e.V. Martin R. Knup Walter Geßky Experimental Aircraft Ass. SWE Alberto Melis Air Sports Fed. / Norwegian AC FRAeS Armageddon Associates R. I. Hey Johan Janda Paul Mahony Nigel Hitchman UK CAA Klaus Fritz FIVU + FSIVA + AeCI + F-CAP Iniziat. Industriali Italiane Spa Werner Tamme Kevin Armstrong Royal Danish Aeroclub Kevin Taylor Carlos Manuel Pires de Sousa	These stakeholders believe that continuing airworthiness requirements should be adapted to the size/ type of aircraft.

136	Historic Aircraft Association	
139	British Microlight Aircraft Ass.	
140	Patrick Walsh	
141	Graham Newby	
142	Assoc.of Aviation Manuf. CR	
147	Belgian Gliding Federation	
148	Aero-Club of Switzerland	
150	FIVV –Fed. Italiana Volo a Vela	
152	European Gliding Union	
153	Johan Geerinck	
155	Ron Alexander	
156	Paul Collins	
157	Brian Johnson	
159	General Aviation Alliance (GAA)	
160	PPL/IR Europe	
167	Helicopter Club of Great Britain	
176	Jiri Koubik	
179	ELSAMA	
187	British Gliding Association	
188	British Hangglid. and Parag. A.	
193	CAA Finland	
202	EADS SOCATA	
203	CAA Belgium, Cert. Dept.	
214	Austrocontrol	
218	CAA Sweden	
219	Swedish Soaring Federation	
220	Dirk Krappel	
222	LAA SR	
225	Federation Française d'Aéostat.	
228	German Aero Club	
236	John Tempest	
240	Light Aircraft Manufacturers Ass.	
247	DGAC-France	
250	Europe Air Sports	
251	ECOGAS	
255	Wolfgang S. Nitschmann	
265	Microlight Flying Magazine	
323	Flight Design GmbH	
470	René Mühlmeier	
809	Achim Zurmühl	
853	Dr. Ing. Gero Dargel	
866	Franz Deters	
940	Ralph Mroczek	
976	Matthias Läßig	
990	Schempp-Hirth Aircraft manuf.	
1019	Aeroclub Příbram, C. Bohemia	
1038	Fédér. Franç. de Planeur Ultral.	
1938	Ralf Gula	
2176	Österreichischer Aero Club	
2234	AOPA Germany	
2611	Réseau du Sport de l'Air	
2705	Philippe Hendrickx	
2707	B&F GmbH - FK-Leichtflugz.	
2709	P. A. Doyle	
2712	Leonhard Jochem	
2713	Bertus Kühn	
2714	Martin Ludwig	
2715	Dt. Fallschirmsportverband e.V.	
2716	Tobias Kretschmar	
185	CAA Czech Republic	These stakeholders do not agree that continuing airworthiness requirements should be adapted to the size/ type of aircraft and propose other criteria.
206	EUROCOPTER	
257	Danish Soaring Association	
289	Lambert Aircraft Engineering	
2	Mike Godsell	These stakeholders support the development of standard modification and repairs by either the TC holder or assessment bodies.
11	Wilhelm Dirks	
23	Motor Flying Union SWE/KSAK	
25	Royal Swedish Aero Club	

31	SAMA	
43	Eckard Glaser	
46	Pete Croney	
51	FFVV	
59	Walter Geßky	
64	Experimental Aircraft Ass. SWE	
66	Air Sports Fed./Aero Club NOR	
67	FRAeS Armageddon Associates	
70	R. I. Hey	
77	Johan Janda	
78	Paul Mahony	
85	Nigel Hitchman	
86	UK CAA	
103	CAA Netherlands	
114	Royal Danish Aeroclub	
130	Kevin Taylor	
134	Carlos Manuel Pires de Sousa	
136	Historic Aircraft Association	
139	British Microlight Aircraft Ass.	
140	Patrick Walsh	
141	Graham Newby	
142	A. of Aviation Manufact. CR	
147	Belgian Gliding Federation	
148	Aero-Club of Switzerland	
150	FIVV–Feder. Italiana Volo a Vela	
152	European Gliding Union	
153	Johan Geerinck	
155	Ron Alexander	
156	Paul Collins	
157	Brian Johnson	
159	General Aviation Alliance (GAA)	
167	Helicopter Club of Great Britain	
176	Jiri Koubik	
185	CAA Czech Republic	
187	British Gliding Association	
193	CAA Finland	
202	EADS SOCATA	
206	EUROCOPTER	
207	Markus Hitter	
214	Austrocontrol	
218	CAA Sweden	
219	Swedish Soaring Federation	
220	Dirk Krappel	
225	Fed. Française d'Aérostation	
228	German Aero Club	
236	John Tempest	
247	DGAC-France	
250	Europe Air Sports	
257	Danish Soaring Association	
262	Malta Departm. of Civil Aviation	
265	Microlight Flying Magazine	
289	Lambert Aircraft Engineering	
323	Flight Design GmbH	
990	Schempp-Hirth Aircraft manuf.	
1019	Aeroclub Příbram, C. Bohemia	
1038	Fédération Franç. de Planeur Ultr.	
2176	Österreichischer Aero Club	
2611	Réseau du Sport de l'Air	
2705	Philippe Hendrickx	
2707	B&F GmbH - FK-Leichtflugz.	
2709	P. A. Doyle	
55	Dt. Ultraleichtflug-Verband e.V.	These stakeholders expressed doubts about the practicability of developing standard modifications or repair.
58	Martin R. Knup	
65	Alberto Melis	
86	UK CAA	
87	Klaus Fritz	
89	FIVU + FSIVA + AeCI + F-CAP	
91	Iniziativa Industriali Italiane Spa	
98	Werner Tamme	

160 179 222 251 254 255 470 809 853 866 940 976 1938 2234 2712 2713 2714 2715 2716	PPL/IR Europe ELSAMA LAA SR ECOGAS AOPA Switzerland Wolfgang S. Nitschmann René Mühlmeier Achim Zurmühl Dr. Ing. Gero Dargel Franz Deters Ralph Mroczek Matthias Läßig Ralf Gula AOPA Germany Leonhard Jochem Bertus Kühn Martin Ludwig Dt. Fallschirmsportverband e.V. Tobias Kretschmar	
23 25 31 46 51 66 67 70 77 86 130 147 153 155 157 176 177 185 193 206 207 218 220 228 236 250 265 323 1038 2705 2707	Motor Flying U. Sweden/KSAK Royal Swedish Aero Club SAMA Pete Croney FFVV Norw. Air Sports Fed. / AC FRAeS Armageddon Associates R. I. Hey Johan Janda UK CAA Kevin Taylor Belgian Gliding Federation Johan Geerinck Ron Alexander Brian Johnson Jiri Koubik CZECH AIRCRAFT WORKS CAA Czech Republic CAA Finland EUROCOPTER Markus Hitter CAA Sweden Dirk Krappel German Aero Club John Tempest Europe Air Sports Microlight Flying Magazine Flight Design GmbH Féd. Franç. Planeur Ultral. Philippe Hendrickx B&F GmbH - FK-Leichtflugz.	These stakeholders support the development of industry standards for continuing airworthiness.
11 59 214 990 2176	Wilhelm Dirks Walter Geßky Austrocontrol Schempp-Hirth Aircraft manuf. Österreichischer Aero Club	These stakeholders do not support the development of industry standards for continuing airworthiness.
25 31 46 55 58 87 98 114 179 222 255 470 809	Royal Swedish Aero Club SAMA Pete Croney Dt. Ultraleichtflug-Verband e.V. Martin R. Knup Klaus Fritz Werner Tamme Royal Danish Aeroclub ELSAMA LAA SR Wolfgang S. Nitschmann René Mühlmeier Achim Zurmühl	These stakeholders propose that industry standards are developed by TC holders.

853 866 940 976 1938 2234 2712 2713 2714 2715 2716	Dr. Ing. Gero Dargel Franz Deters Ralph Mroczek Matthias Läßig Ralf Gula AOPA Germany Leonhard Jochem Bertus Kühn Martin Ludwig Dt. Fallschirmsportverband e.V. Tobias Kretschmar	
46 51 78 114 134 139 140 142 159 167 251 289 1019	Pete Croney FFVV Paul Mahony Royal Danish Aeroclub Carlos Manuel Pires de Sousa British Microlight Aircraft Ass. Patrick Walsh Ass. Aviation Manuf. CZ General Aviation Alliance (GAA) Helicopter Club of Great Britain ECOGAS Lambert Aircraft Engineering AC Příbram, Central Bohemia	These stakeholders propose that industry standards are developed by assessment bodies.
23 65 85 89 91 136 141 148 150 152 187 219 240 257	Motor Flying Union SWE /KSAK Alberto Melis Nigel Hitchman FIVU + FSIVA + AeCI + F-CAP Iniziative Industriali Italiane Spa Historic Aircraft Association Graham Newby Aero-Club of Switzerland FIVV–Feder. Italiana Volo a Vela European Gliding Union British Gliding Association Swedish Soaring Federation Light Aircraft Manuf. Association Danish Soaring Association	These stakeholders propose that industry standards are developed by other organisations (e.g. associations, standardisation bodies).
17 28 51 52 59 65 88 89 90 91 103 122 158 160 161 176 178 189 193 194 195 200 206 209 211 217 220 233 237	ENAC Tom Wade FFVV Patrick Faucheron Walter Geßky Alberto Melis Limbach Flugmotoren GmbH FIVU + FSIVA + AeCI + F-CAP CAA Belgium Iniziative Industriali Italiane Spa CAA Netherlands Club Fournier International (DE) Joe Sullivan Beng PPL/IR Europe P. van Ootmarsum Jiri Koubik Michael Peters Emmanuel S. Davidson CAA Finland Luftfahrt-Bundesamt IAOPA Europe Norwegian Aero Club EUROCOPTER Aircraft Engines, BRP-ROTAX European Sailplane Manufact. OSTIV Dirk Krappel Land und Forstflug GmbH AOPA UK	These stakeholders do not reply to the specific items but support simplified regulations.

244	Michael Peters	
247	DGAC-France	
253	Federal Aviation Administration	
262	Malta Departm. of Civil Aviation	
263	Fed. Francaise Aeronautique	
2176	Österreichischer Aero Club	
2569	Michael Heiß	

Analysis – Question 4

The view of stakeholders may be summed-up as follows:

- 1. The vast majority supports the involvement of assessment bodies in the oversight of continuing airworthiness. Only a small minority (including 6 National Authorities) do not support such involvement.*
- 2. The vast majority propose no or a minimal role for National Authorities. Only a small minority (including 6 National Authorities) support such an involvement.*
- 3. The vast majority believe that continuing airworthiness requirements should be adapted to the size / type of aircraft. A significant number however did not agree to this idea and proposed other criteria.*
- 4. A majority supports the development of standard modification by the TC holders or assessment bodies. A significant number however expressed doubts to the practicality of developing such standard modifications or repairs.*
- 5. Stakeholders were almost unanimous in supporting the use of Industry standards. Mixed views were expressed concerning who should develop them: suggestions were TC holders, Assessment Bodies, Associations, Standardisation Bodies.*
- 6. Although they did not directly reply to the above questions, a number of stakeholders supported simplified regulations.*

Question 5

The agency is interested in knowing the opinion of stakeholders on what they think should be the content of the “light” implementing rules for air operations.

Cmnt nr	From	Nature
51 67 136 176 185 188 189 202 217 222 257	FFVV FRAeS Armaggedon Associates Historic Aircraft Association Jiri Koubik CAA Czech Republic British HG Paragliding Associat. Emmanuel S. Davidson EADS SOCATA OSTIV LAA SR Danish Soaring Association	These stakeholders do not answer the question directly or the answer is unclear. Some of them provide additional information about air operation related items.
11 65 89 91 108 2611	Wilhelm Dirks Alberto Melis FIVU + FSIVA + AeCI + F-CAP Iniziative Industriali Italiane Spa Kevin Armstrong Réseau du Sport de l'Air	These stakeholders believe that there is no need to develop and/or establish “light” implementing rules for air operations. Some of them mentioned Option 0 or they explained that the Essential Requirements are detailed enough.
	134 persons with an identical response (see Annex 5 - list of commentators - question 5-1)	These persons / organisations sent an identical response for all 7 questions. They are not in favour with the idea to create "light" implementing rules for air operations. They consider the existing operational requirements as detailed enough. Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD.
46 55 56 58 62 69 72 76 77 78 80 86 87 98 140 142 153 157 159 160 167 169 179 187 193 194 195 201 211 218 219	Pete Croney Dt. Ultraleichtflug-Verband e.V. Richard Meredith-Hardy Martin R. Knup Mike Chilvers Tony Halsall Simon Baker Geoffrey Foster Johan Janda Paul Mahony Direction Gén. Transp. Aérien UK CAA Klaus Fritz Werner Tamme Patrick Walsh ALV Czech Republic Johan Geerinck Brian Johnson General Aviation Alliance (GAA) PPL/IR Europe Helicopter Club of Great Britain Julian Scarfe ELSAMA British Gliding Association CAA Finland Luftfahrt-Bundesamt IAOPA Europe Tormod Veiby European Sailplane Manufact. CAA Sweden Swedish Soaring Federation	These stakeholders agree with the idea to create "light" implementing rules for air operations aligned to ICAO standards. Some of them mentioned option 1 to be the preferred way of establishing.

237 247 254 255 265 323 470 809 853 866 940 976 1019 1938 2234 2705 2707 2712 2713 2714 2715 2716	AOPA UK DGAC-France AOPA Switzerland Wolfgang S. Nitschmann Microlight Flying Magazine Flight Design GmbH René Mühlmeier Achim Zurmühl Dr. Ing. Gero Dargel Franz Deters Ralph Mroczek Matthias Läßig AC Příbram, Central Bohemia Ralf Gula AOPA Germany Philippe Hendrickx B&F GmbH - FK-Leichtflugz. Leonhard Jochem Bertus Kühn Martin Ludwig Dt. Fallschirmsportverband e.V. Tobias Kretschmar	
17 23 25 66 70 114 148 150 152 251 2077	ENAC Motor Flying Union SWE/ KSAK Royal Swedish Aero Club Air Sports Fed./AC Norway R. I. Hey Royal Danish Aeroclub Aero-Club of Switzerland FIVV –Fed. Ital. Volo a Vela European Gliding Union ECOGAS European Airshow Council	These stakeholders agree with the idea to create "light" implementing rules and mention option 2 (AMC material to be developed) as the preferred solution.
	212 persons with an identical response (see Annex 5 - list of commentators -question 5-2)	These persons or organisations sent an identical response. They agree with the idea to create "light" implementing rules for air operations and propose to follow the ICAO standards with minimal requirements. Due to the high number of 212 identical comments, the names of these stakeholders are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD.
86 150 152 187 193 211 228 237 250 263	UK CAA FIVV –Fed. Ital. Volo a Vela European Gliding Union British Gliding Association CAA Finland European Sailplane Manufact. German Aero Club AOPA UK Europe Air Sports Federat. Francaise Aeronautique	These stakeholders advise to also take draft JAR OPS 0 into consideration when developing the Implementing Rules. Some of them are mentioning ICAO standards too.
139 141 147	British Microlight Aircraft Assoc. Graham Newby Belgian Gliding Federation	These stakeholders suggest establishing "light" implementing rules which are based on a risk assessment and/or the maximum take off mass and/or the type of operation.

Analysis – Question 5

The vast majority of respondents believed there was a need to develop some kind of “light” implementing rules for air operation in order to further explain how compliance with the Essential Requirements was to be reached. Most of them mentioned the importance of considering the ICAO standards within these requirements.

Only very few stakeholders believe that there is no need to develop and/or establish some kind of “light” implementing rules for air operation and to stay with the Essential Requirements.

Question 6 (a/b/c)

The Agency is interested in knowing the opinion of the stakeholders on what they think should be the conditions and privileges of a European Pilot Licence, with particular emphasize be interested to know stakeholders' views as regard on:

- a) The type of aircraft it would allow to fly and in particular whether an upper weight limit would be appropriate?
- b) The ratings that could be attached to such a licence.
- c) The way medical assessments could be done and the possible role of the general practitioners

General comments for all three parts of this question

Cmnt nr	From	Nature
9 13 19 28 41 49 129 137 160 172 174 185 197 198 224 233 237 682 1124	Jürgen Böttcher Ken Haslett O. Truska Tom Wade Jim Ryan Peer Ketterle Philip Purcell Hans Jürgen Lammers PPL/IR Europe Keith Pilson Maurice Cronin CAA Czech Republic Aviation South West R. S. Bristowe GAMA Land und Forstflug GmbH AOPA UK Joe Sullivan Beng Ralph Llewellyn	These stakeholders do not answer the question directly or the answer is unclear. Some of them provide other information about the: <ul style="list-style-type: none"> - equivalent national licence requirements - proposals for the revalidation requirements - recommendations for future intervals for the medical assessment - crediting requirements - name of the new licence - revision of the existing JAR-FCL requirements - future transfer to a FCL based licence
193 195 266	CAA Finland IAOPA Europe East Midlands Flying School Ltd	These stakeholders do not support the creation of a European Private Pilot Licence (EPPL) as proposed at all. Some of them propose to stay with a JAR FCL equivalent EU licence for powered aircraft and an ICAO based European licence for the other aircraft categories like airships, gliders, or balloons. One stakeholder mentioned that this kind of licence should only be issued for microlight pilots.
17 171 209 253 263 2611	ENAC Noel Maher Aircraft Engines, BRP-ROTAX Federal Aviation Administration Fédération Franç. Aéronautique Réseau du Sport de l'Air	These stakeholders are in favour of Option 1. They gave additional comments on licensing related subjects.
	212 persons with an identical response (see Annex 6 - list of commentators - question 6-1)	These persons/organisations sent an identical response. They are in favour with the introduction of an EPPL for all kind of aircraft up to 5700 kg MTOM, any kind of rating and a medical assessment done by a self declaration with the support of a general practitioner. Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD.
	319 persons with an identical response (Annex 6 - list of commentators-question 6-2)	These persons/organisations sent an identical response. They are in favour of the introduction of an EPPL with ratings for airplanes, gliders, Touring Motor Gliders and balloons (no upper mass limit mentioned) and a medical assessment done by a general practitioner with an additional self declaration. Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD

	<p>About 134 persons with an identical response (Annex 6 - list of commentators-question 6-3)</p>	<p>These 134 persons / organisations sent an identical response for all 7 questions. They are in favour with the introduction of an EPPL for aircraft up to 5,7 t MTOM with subdivisions for 750 kg and 2500 kg MTOM and mentioned the high theoretical level of the FCL license. They recommended different kind of ratings like aerobatics, IFR or mountain flying.</p> <p>Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD</p>
--	--	---

Analysis – Question 6(a/b/c) – general comments

The vast majority of the stakeholders listed in this general section highly supported the envisaged new concept for a European pilot licence.

A minority of stakeholders do not support the creation of a European Pilot Licence as described in the A-NPA. Some of them stated to stay with the JAR FCL equivalent EU-licence for powered aircraft and an ICAO based licence for the other categories.

The proposed medical assessment is a system which is using the general practitioner and some kind of additional self declaration by the pilot.

Question 6 (a)

The Agency is interested in knowing the opinion of the stakeholders on what they think should be the conditions and privileges of a European Pilot Licence, with particular emphasis be interested to know stakeholders' views as regard on:

a) The type of aircraft it would allow to fly and in particular whether an upper weight limit would be appropriate?

Cmnt nr	From	Nature
39 40 77 79 142 153 165 176 192 217 247 254 265 2709	William Treacy Peter Baustetter Johan Janda CAA BELGIUM ALV Czech Republic Johan Geerinck Thomas Zschieschang Jiri Koubik Paul Handover OSTIV DGAC-France AOPA Switzerland Microlight Flying Magazine P. A. Doyle	These stakeholders broadly support the creation of a European Pilot Licence for different types of aircraft but do not propose an upper mass limit. Some of them don't mention a specific category of aircraft either.
5 8 27 32 44 46 55 58 64 65 69 87 89 91 98 130 132 140 147 155 156 157 179 187 208 211 216 255 289 323 470 809 853 866 940 976 1938	Aidan Frost Eberhard Lulay Darrell Aldersea Michael Traynor Peter Morris Pete Croney Dt. Ultraleichtflug-Verband e.V. Martin R. Knup Experimental Aircraft Ass. SWE Alberto Melis Tony Halsall Klaus Fritz FIVU + FSIVA + AeCI + F-CAP Iniziativa Industr. Italiane Spa Werner Tamme Kevin Taylor Classic and Aerobatic Club Ireland Patrick Walsh Belgian Gliding Federation Ron Alexander Paul Collins Brian Johnson ELSAMA British Gliding Association Milan Mach European Sailplane Manufacturers Bickerton's Aerodromes Ltd Wolfgang S. Nitschmann Lambert Aircraft Engineering bvba Flight Design GmbH René Mühlmeier Achim Zurmühl Dr. Ing. Gero Dargel Franz Deters Ralph Mroczek Matthias Läßig Ralf Gula	These stakeholders broadly support the creation of a European Pilot Licence as envisaged and propose an upper weight limit of 5700 kg MTOM. Some of them recommend a subdivision for aircraft up to 2000kg MTOM. Some of them do not give a clear answer for which type of aircraft this new licence should be introduced but the majority proposes a licence for all kind of aircraft categories (some of them with the addition "all Non Complex aircraft").

2234 2707 2712 2713 2714 2715 2716	AOPA Germany B&F GmbH - FK-Leichtflugzeuge Leonhard Jochem Bertus Kühn Martin Ludwig Dt. Fallschirmsportverband e.V. Tobias Kretschmar	
11 17 23 25 30 34 43 59 66 67 70 73 80 85 86 108 114 134 136 139 146 147 148 150 152 158 161 170 171 177 180 189 194 199 202 209 214 218 219 222 225 228 250 251 257 263 1019 2611 2709 2731	Wilhelm Dirks ENAC Motor Flying U. Sweden /KSAK Royal Swedish Aero Club Jan Brill Wolff A. Ehrhardt Eckard Glaser Walter Geßky Air Sports Federation / AC Norway FRAeS Armagedon Associates R. I. Hey British Helicopter Advisory Board Direct. Générale Transport Aérien Nigel Hitchman UK CAA Kevin Armstrong Royal Danish Aeroclub Carlos Manuel Pires de Sousa Historic Aircraft Association British Microlight Aircraft Ass. Richard la Croix Belgian Gliding Federation Aero-Club of Switzerland FIVV –Feder. Ital. Volo a Vela European Gliding Union Joe Sullivan Beng P. van Ootmarsum Kai Mönkkönen Noel Maher CZECH AIRCRAFT WORKS Wolfgang Lamminger Emmanuel S. Davidson Luftfahrt-Bundesamt Andre Jansen EADS SOCATA Aircraft Engines, BRP-ROTAX Austrocontrol CAA Sweden Swedish Soaring Federation LAA SR Federation Française d’Aérostation German Aero Club Europe Air Sports ECOGAS Danish Soaring Association Federation Francaise Aeronautique AC Příbram, Central Bohemia Réseau du Sport de l’Air P. A. Doyle Felix Cronin	These stakeholders broadly support the creation of a European Pilot Licence as described and propose an upper mass limit of 2000 kg MTOM or even less for different types of aircrafts. Some of them propose further subdivision for aircraft up to 750 kg MTOM or 1000 kg MTOM.
167	Helicopter Club of Great Britain	This stakeholder broadly supports the creation of a European Pilot Licence as envisaged and proposes an upper weight limit of 2250 kg MTOM for helicopters.
141 159 163 236	Graham Newby General Aviation Alliance (GAA) Federal Office of Civil Aviation John Tempest	These stakeholders support the creation of a European Pilot Licence as proposed and mention an upper mass limit of 2730 kg MTOM for different kind of aircraft. Some of them recommend another subdivision for a lower MTOM.

Analysis – Question 6(a)

The slight majority of stakeholders considered that the future European (private) pilot licence should be introduced for aircraft with a MTOM up to 5700 kg. However a considerable number of stakeholders proposed to develop such a licence for non-complex aircraft only up to 2000 kg MTOM. Some of these stakeholders recommend a further subdivision for aircraft up to 750kg or 1000 kg MTOM. Most of the stakeholders are in favour of a licence for the following aircraft categories:

- Powered aircraft (aeroplanes)*
- Balloons*
- Gliders*

Only very few stakeholders see a need for such a licence for helicopter pilots

Question 6 (b)

The Agency is interested in knowing the opinion of the stakeholders on what they think should be the conditions and privileges of a European Pilot Licence, with particular emphasis be interested to know stakeholders' views as regard on:

b) The ratings that could be attached to such a licence

Cmnt nr	From	Nature
73 218	British Helicopter Advis. Board CAA Sweden	These stakeholders disagree with the concept of ratings at all.
130 134 140 159 208 251	Kevin Taylor Carlos Manuel Pires de Sousa Patrick Walsh General Aviation Alliance (GAA) Milan Mach ECOGAS	These stakeholders support all kind of ratings without further description.
59 66 114 122 148 187 189 211 219 228 250 257 289 793 2611	Walter Geßky Air Sports Federat. /AC Norway Royal Danish Aeroclub Club Fournier International (DE) Aero-Club of Switzerland British Gliding Association Emmanuel S. Davidson European Sailplane Manufact. Swedish Soaring Federation German Aero Club Europe Air Sports Danish Soaring Association Lambert Aircraft Engineering Knut Kaiser Réseau du Sport de l'Air	These stakeholders recommend a basic licence and ratings for the different aircraft categories or types like aeroplanes and/or Touring Motor Gliders and/or gliders and/or balloons and/or helicopters.
3 8 11 12 21 23 25 26 30 34 39 44 46 49 50 51 54 55 58 59 64 65 66 67 69 70 74	Emil Pop Eberhard Lulay Wilhelm Dirks Timothy Morris Donald Smith Motor Flying Union SWE/ KSAK Royal Swedish Aero Club John Milner Jan Brill Wolff A. Ehrhardt William Treacy Peter Morris Pete Croney Peer Ketterle Mathias Leisl FFVV H. Walter Dt. Ultraleichtflug-Verband e.V. Martin R. Knup Walter Geßky Experimental Aircraft A. Sweden Alberto Melis Norwegian Air Sports Fed. / NAC FRAeS Armaggedon Associates Tony Halsall R. I. Hey Kathrin Havemann	These stakeholders are in favour of the concept of additional ratings for the European Pilot Licence. The most recommended ratings are the ratings for Instrument flying, instructing, night flying, aerobatics or towing. Some other ratings/qualifications which are mentioned: - seaplane - multi-engine - mountain flying - cloud flying - controlled VFR (CVFR) - IMC - examiner - parachute dropping

79	CAA BELGIUM	
85	Nigel Hitchman	
87	Klaus Fritz	
89	FIVU + FSIVA + AeCI + F-CAP	
91	Iniziative Industriali Italiane Spa	
98	Werner Tamme	
108	Kevin Armstrong	
114	Royal Danish Aeroclub	
132	Classic Aerobatic Club Ireland	
133	Dr. Friedrich Renner	
136	Historic Aircraft Association	
139	British Microlight Aircraft Assoc.	
141	Graham Newby	
142	ALV in Czech Republic	
146	Richard la Croix	
147	Belgian Gliding Federation	
155	Ron Alexander	
156	Paul Collins	
157	Brian Johnson	
158	Joe Sullivan Beng	
163	Federal Office of Civil Aviation	
164	Elmar Bresser	
165	Thomas Zschieschang	
171	Noel Maher	
174	Maurice Cronin	
176	Jiri Koubik	
177	CZECH AIRCRAFT WORKS	
179	ELSAMA	
180	Wolfgang Lamminger	
182	Hans P. Christeler & René Schaad	
189	Emmanuel S. Davidson	
192	Paul Handover	
199	Andre Jansen	
202	EADS SOCATA	
210	Marion Choudet	
211	European Sailplane Manufact.	
216	Bickerton's Aerodromes Ltd	
217	OSTIV	
219	Swedish Soaring Federation	
228	German Aero Club	
236	John Tempest	
247	DGAC-France	
250	Europe Air Sports	
255	Wolfgang S. Nitschmann	
257	Danish Soaring Association	
289	Lambert Aircraft Eng. bvba	
323	Flight Design GmbH	
470	René Mühlmeier	
809	Achim Zurmühl	
853	Dr. Ing. Gero Dargel	
866	Franz Deters	
940	Ralph Mroczek	
976	Matthias Läßig	
1938	Ralf Gula	
2082	Michael Rees	
2234	AOPA Germany	
2707	B&F GmbH - FK-Leichtflugz.	
2709	P. A. Doyle	
2712	Leonhard Jochem	
2713	Bertus Kühn	
2714	Martin Ludwig	
2715	Dt. Fallschirmsportverband e.V.	
2716	Tobias Kretschmar	
11	Wilhelm Dirks	These stakeholders are in favour of the concept of additional ratings for the European Pilot Licence. They also recommend a rating for maintenance tasks.
59	Walter Geßky	
70	R. I. Hey	
180	Wolfgang Lamminger	
2709	P. A. Doyle	

Analysis – question 6 (b)

The vast majority of stakeholders considered that all the existing types of ratings should be introduced for the future European PPL. The majority of stakeholders mentioned ratings for instrument flying, instructing, aerobatic, night-flying and towing. Some other ratings are proposed.

However a significant minority propose to create a basic licence and additional ratings for the different aircraft categories.

2 stakeholders disagree with the concept of ratings at all.

Question 6 (c)

The Agency is interested in knowing the opinion of the stakeholders on what they think should be the conditions and privileges of a European Pilot Licence, with particular emphasis be interested to know stakeholders' views as regard on:

c) The way medical assessments could be done and the possible role of the general practitioners

Cmnt nr.	From	Nature
65 231	Alberto Melis Jörg Meinhold	These stakeholders see no need for a medical check at all.
17 18 59 60 184 193 194 243	ENAC Thomas Wendl Walter Geßky Dt. Fliegerarztverband e.V. Dr Peter Nightingale CAA Finland Luftfahrt-Bundesamt Dt. Ges. Luft und Raumf.medizin	These stakeholders are not in favour of a medical assessment based on an attestation / certificate of a General Practitioner or some kind of self-declaration. They request an assessment done by an AME or AMC. Some of them mention a medical assessment based on the ICAO medical requirements.
5 8 23 27 32 43 46 51 67 69 70 77 85 86 114 122 130 134 136 139 140 141 147 153 155 156 157 159 167 170 177 180 187 188 199 208 211 212 217 222 228 230	Aidan Frost Eberhard Lulay Motor Flying Union SWE/KSAK Darrell Aldersea Michael Traynor Eckard Glaser Pete Croney FFVV FRAeS Armageddon Associates Tony Halsall R. I. Hey Johan Janda Nigel Hitchman UK CAA Royal Danish Aeroclub Club Fournier International (DE) Kevin Taylor Carlos Manuel Pires de Sousa Historic Aircraft Association British Microlight Aircraft Assoc. Patrick Walsh Graham Newby Belgian Gliding Federation Johan Geerinck Ron Alexander Paul Collins Brian Johnson General Aviation Alliance (GAA) Helicopter Club of Great Britain Kai Mönkkönen CZECH AIRCRAFT WORKS Wolfgang Lamminger British Gliding Association British HG Paragliding Assoc. Andre Jansen Milan Mach European Sailplane Manufacturer Eric Verhoeven OSTIV LAA SR German Aero Club ESAM	These stakeholders support a medical assessment based on some sort of self declaration. Most of them propose to combine it with an assessment or support done by a general practitioner, some others point out that the initial check must be done by an AME or AMC.

236	John Tempest	
250	Europe Air Sports	
252	Stephen McCormick	
257	Danish Soaring Association	
289	Lambert Aircraft Engin. bvba	
323	Flight Design GmbH	
793	Knut Kaiser	
1938	Ralf Gula	
2611	Réseau du Sport de l'Air	
2705	Philippe Hendrickx	
2707	B&F - FK-Leichtflugzeugbau	
11	Wilhelm Dirks	These stakeholders propose to introduce a medical assessment based on an attestation / certificate of a General Practitioner (GP). Some of the stakeholders stated that an approved standard of special aviation medicine knowledge of the GP must be ensured. A few of them propose to request an initial check by an AME.
15	Gregor Gaida	
25	Royal Swedish Aero Club	
42	Thomas Proegler	
55	Dt. Ultraleichtflug-Verband e.V.	
58	Martin R. Knup	
61	Roger Hurley	
64	Experimental Aircraft Ass. SWE	
65	Alberto Melis	
66	Air Sports Fed. / AC Norway	
73	British Helic. Advisory Board	
74	Kathrin Havemann	
79	CAA BELGIUM	
87	Klaus Fritz	
89	FIVU + FSIVA + AeCI + F-CAP	
91	Iniziative Industriali Italiane Spa	
98	Werner Tamm	
132	Classic Aerob. Club of Ireland	
142	Assoc. of Aviation Manufact. CR	
148	Aero-Club of Switzerland	
150	FIVV –Feder. Ital. Volo a Vela	
152	European Gliding Union	
158	Joe Sullivan Beng	
161	P. van Ootmarsum	
166	Volker Rath	
171	Noel Maher	
179	ELSAMA	
189	Emmanuel S. Davidson	
192	Paul Handover	
202	EADS SOCATA	
209	Aircraft Engines, BRP-ROTAX	
218	CAA Sweden	
219	Swedish Soaring Federation	
247	DGAC-France	
255	Wolfgang S. Nitschmann	
263	Federation Francaise Aeronaut.	
470	René Mühlmeier	
809	Achim Zurmühl	
853	Dr. Ing. Gero Dargel	
866	Franz Deters	
940	Ralph Mroczek	
976	Matthias Läßig	
2234	AOPA Germany	
2709	P. A. Doyle	
2712	Leonhard Jochem	
2713	Bertus Kühn	
2714	Martin Ludwig	
2715	Dt. Fallschirmsportverband e.V.	
2716	Tobias Kretschmar	

Analysis – question 6(c)

The majority of stakeholders (a major part are identical responses – see 6(a/b/c) general comments) consider that a medical assessment carried out by a general practitioner accompanied by some kind of self declaration would be the right solution for this new European licence. Many of them mentioned that an approved standard of aviation medicine knowledge must be ensured.

A notable number of stakeholders are in line with a process based mainly on self-declaration of the pilot. Many of them considered in addition to that (or especially for the initial medical check) an assessment by the general practitioner. Amongst these only a few recommended an initial check by an AME or AMC with a subsequent procedure involving general practitioners based on self declaration.

Finally only a very small number of stakeholders expressed their disagreement with the proposal to introduce a system based on the general practitioner. They stated that for this licence the existing medical system of AMEs and AMCs should be used.

Question 7

The agency is interested in knowing whether stakeholders think possible to remove certain aircraft from Annex II if the envisaged concept (in particular with options 2 or 3 for initial airworthiness) were implemented.

Cmnt nr	From	Nature
4 59 71 136 139 142 147 160 195 209 218 2709	Miluse Svátková Walter Geßky Pete Morris Historic Aircraft Association British Microlight Aircraft A. ALV Czech Republic Belgian Gliding Federation PPL/IR Europe IAOPA Europe Aircraft Engines, BRP-ROTAX CAA Sweden P. A. Doyle	These stakeholders do not answer the question directly or the answer is unclear. Some of them provide other additional maintenance or airworthiness related comments.
23 55 58 65 75 77 87 89 91 98 130 153 156 179 185 188 189 196 202 222 228 237 247 250 255 263 265 322 323 359 470 650 809 853 866 940 976 1019 1468 1938 2234 2611 2705	Motor Flying Union SwE/KSAK Dt. Ultraleichtflug-Verband e.V. Martin R. Knup Alberto Melis EHPU Johan Janda Klaus Fritz FIVU + FSIVA + AeCI + F-CAP Iniziativa Industriali Italiane Spa Werner Tamme Kevin Taylor Johan Geerinck Paul Collins ELSAMA CAA Czech Republic British HG Paragliding Ass. Emmanuel S. Davidson SNPPAL EADS SOCATA LAA SR German Aero Club AOPA UK DGAC-France Europe Air Sports Wolfgang S. Nitschmann Fed. Francaise Aeronautique Microlight Flying Magazine Gareth Jones Flight Design GmbH Franco Di Lella René Mühlmeier Laurie Hurman Achim Zurmühl Dr. Ing. Gero Dargel Franz Deters Ralph Mroczek Matthias Läßig Aerocl. Příbram, Cent. Bohemia Petr Soukup Ralf Gula AOPA Germany Réseau du Sport de l'Air Philippe Hendrickx	These stakeholders insist that no aircraft category should be removed from Annex II. Some of them highlighted especially the categories microlights or hanggliders.

2707 2712 2713 2714 2715 2716	B&F - FK-Leichtflugzeuge Leonhard Jochem Bertus Kühn Martin Ludwig Dt. Fallschirmsportverband e.V. Tobias Kretschmar	
	1797 persons with an identical response (see Annex 1 - list of commentators -question 7-1)	These persons / organisations sent an identical response. They insist that no aircraft category should be removed from Annex II. Due to the very high number of duplicates, the names of these stakeholders are not listed in this Inventory of Answers. However, their names are contained in a separate file issued as part of the CRD.
	134 persons with an identical response (see Annex 1 - list of commentators -question 7-2)	These persons/organisations sent an identical response for all 7 questions. They insist that no aircraft category should be removed from Annex II. Due to the high number of duplicates, the names of these stakeholders are not listed in this Inventory of answers. However, their names are contained in a separate file issued as part of the CRD.
25 46 64 66 69 70 85 86 103 114 118 140 145 148 150 152 153 155 157 159 167 187 191 193 194 200 204 208 219 236 251 257 289 752 980 984 986 988 991 992 993 994 995 996 1000 1002 1007 1009 1010 1011 1013	Royal Swedish Aero Club Pete Crony Experimental Aircraft A. SWE Norwegian Air Sports Federation Tony Halsall R. I. Hey Nigel Hitchman UK CAA CAA Netherlands Royal Danish Aeroclub Trevor Sexton Patrick Walsh T Harrison-Smith Aero-Club of Switzerland FIVV –Fed. Ital. Volo a Vela European Gliding Union Johan Geerinck Ron Alexander Brian Johnson General Aviation Alliance (GAA) Helicopter Club of Great Britain British Gliding Association Ben Syson CAA Finland Luftfahrt-Bundesamt Norwegian Aero Club STZ-AFL Milan Mach Swedish Soaring Federation John Tempest ECOGAS Danish Soaring Association Lambert Aircraft Eng. bvba Neil Broughton Josef Hoffmann Julius Mlynár Venek Hudecek Milan Mrnuščík Ass. of Air Operators of CR Zdenek Jurecek Martin Marecek Light Aircraft Association CR Tomáš Grufík Vít Kotek Vlastimil Ritter Petr Chvojka Josef Vavřík Aeromarine Jan Fridrich Jan Lukeš Dova Aircraft	These stakeholders insist that no aircraft category should be removed from Annex II for the time being. But they indicate that with the proposed changes of this concept in future aircraft categories could possibly be removed. Some stakeholders mention the category “microlights” in this case.

1017	Jiri Holanec	
11 79 108	Wilhelm Dirks CAA BELGIUM Kevin Armstrong	These stakeholders propose that “microlights” should be removed from Annex II.
80 214 233	Direction Gén. Transp. Aérien Austrocontrol Land und Forstflug GmbH	These stakeholders propose to withdraw the whole Annex II.
51 67 176 177 199 322 359 980 984 986 988 991 992 993 994 995 996 1000 1002 1007 1009 1010 1011 1013 1017 1468	FFVV FRAeS Armagedon Associates Jiri Koubik CZECH AIRCRAFT WORKS Andre Jansen Gareth Jones Franco Di Lella Josef Hoffmann Julius Mlynár Venek Hudecek Milan Mrnuščík Ass. of Air Operators of CR Zdenek Jurecek Martin Marecek Light Aircraft Ass. CR Tomáš Grufík Vít Kotek Vlastimil Ritter Petr Chvojka Josef Vavřík Aeromarine Jan Fridrich Jan Lukeš Dova Aircraft Jiri Holanec Petr Soukup	These stakeholders insist that no aircraft category should be removed from Annex II. Furthermore they propose to expand the listed aircraft categories in Annex II and to include some more aircraft categories with higher mass limits. Some of them mention the category microlight as a possible Annex II category up to 560 kg / 600 kg MTOM.
31	SAMA	This stakeholder believes that simplified standards should be developed also for the aircraft categories which are listed in Annex II.
211 217	European Sailplane Manufact. OSTIV	These stakeholders propose a dual system with both options by offering an open choice for manufacturers and operators to stay within Annex II or to be under EASA regulation for a certain time period.

Analysis – Question 7

On this and on some of the other questions (see annexes) a massive organised mailing campaign was orchestrated. The numerous identical answers have been merged and are considered as representing one interest group.

Considering the above the answers to the questions are divided. While half of the stakeholders strongly recommended that no aircraft category should be removed from Annex II of the Basic Regulation, some of them mentioning especially the category of “microlights”, another half indicated that with the introduction of the proposed changes of the concept for better regulation of General Aviation in future some aircraft categories possibly could be removed from Annex I.

A certain number of stakeholders, mainly representing one activity located mainly in one Member State, proposed to expand the listed aircraft categories in Annex II and to include some more categories with higher mass limits.