

Summary of the public consultation results

Commission initiative on aviation safety and possible revision of Regulation (EC) 216/2008

Disclaimer:

This summary provides a factual overview of the results of the public consultation carried out by the European Commission through its on-line survey. This summary is not intended to provide views of the Commission on the results of this consultation. It also does not contain an analysis or weighting of the opinions. This analysis and weighting will be conducted in the context of the Impact Assessment being carried out by the services of the Commission. The results of this survey is one element which will be used, together with other evidence, to develop the Impact Assessment report on the Commission initiative on aviation safety and possible revision of Regulation (EC) 216/2008.

Background of the initiative:

The European Aviation Safety System is one of the safest in the world. In order to keep up this excellent safety record or improve it, and taking into account the anticipated future traffic growth, continuous efforts are necessary. The general objective of this initiative is therefore to improve the performance of the European aviation system with regard to safety, competitiveness, environmental protection and quality of air services provided to citizens, by setting the appropriate regulatory framework. In this respect the European Commission had identified, based on preliminary contacts with Member States and aviation sector stakeholders, a number of issues which potentially may need to be addressed, as well as possible high level policy objectives and options.

This online consultation asked for informed opinions and suggestions to help identify strengths and weaknesses in the present EU aviation safety system as well as possibilities for improvement with regard to safety, competitiveness, environmental protection and quality of air services. The aim of the consultation was to assess if the challenges identified by the European Commission are accurate and in-line with stakeholders' opinions, and also whether stakeholders support the proposed objectives and policy measures. The results of this consultation will feed into the Commission impact assessment which will accompany the policy initiative on aviation safety and a possible revision of Regulation (EC) No 216/2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency.

The questionnaire comprised 44 multiple choice and open questions.

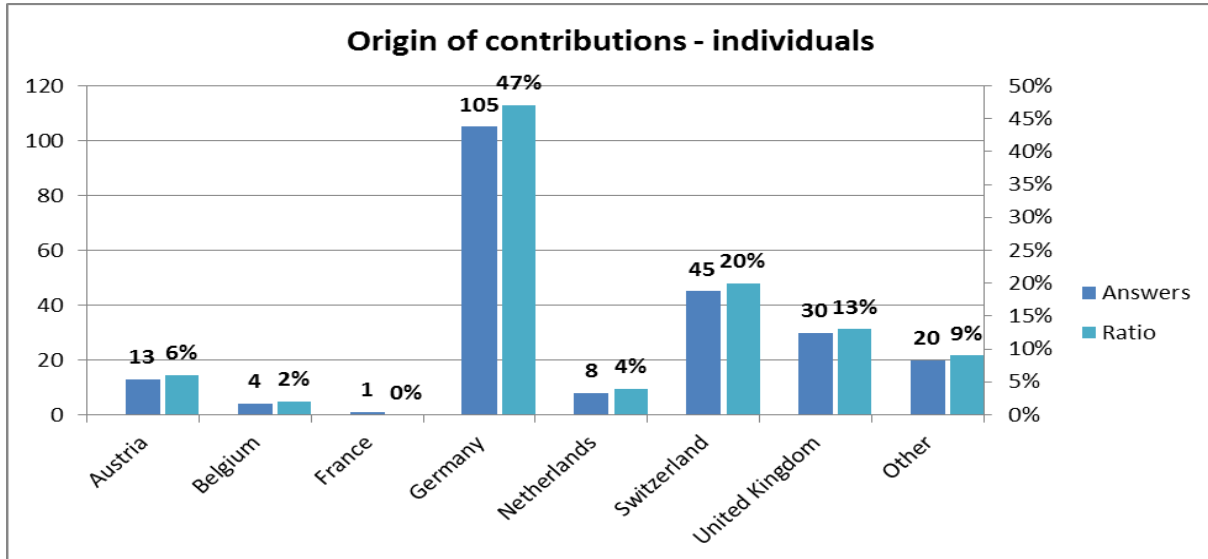
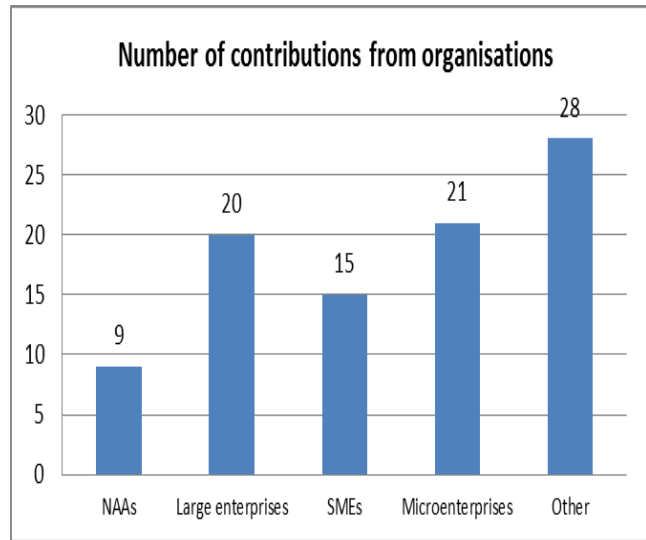
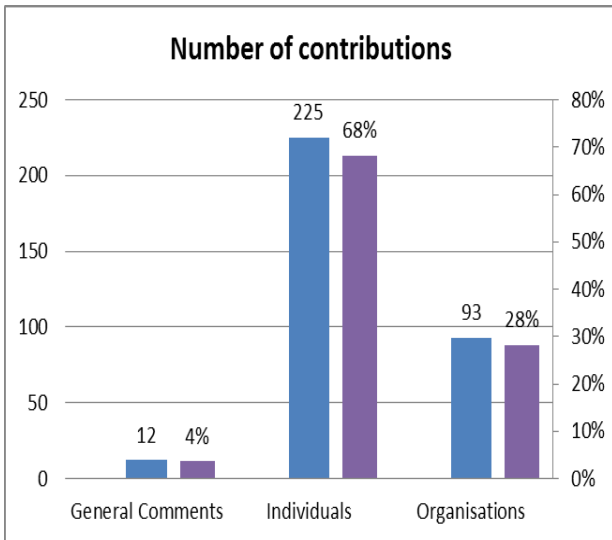
This questionnaire was complemented by a consultation entitled "*Advance Notice of Proposed Amendment (A-NPA) 2014-12 - European Commission policy initiative on aviation safety and a possible revision of Regulation (EC) No 216/2008*" which was launched by the European Aviation Safety Agency (EASA) in cooperation with the European Commission. The A-NPA addressed more specific issues related to aviation safety and the EASA system, and was based on open questions. Member States and stakeholders were invited to also provide their views under the A-NPA. Also the replies to the A-NPA will feed into the impact assessment of the overall policy initiative.

A. GENERAL OVERVIEW OF CONTRIBUTION SOURCES

The public consultation has been opened on 23 May and closed on 15 September 2014.

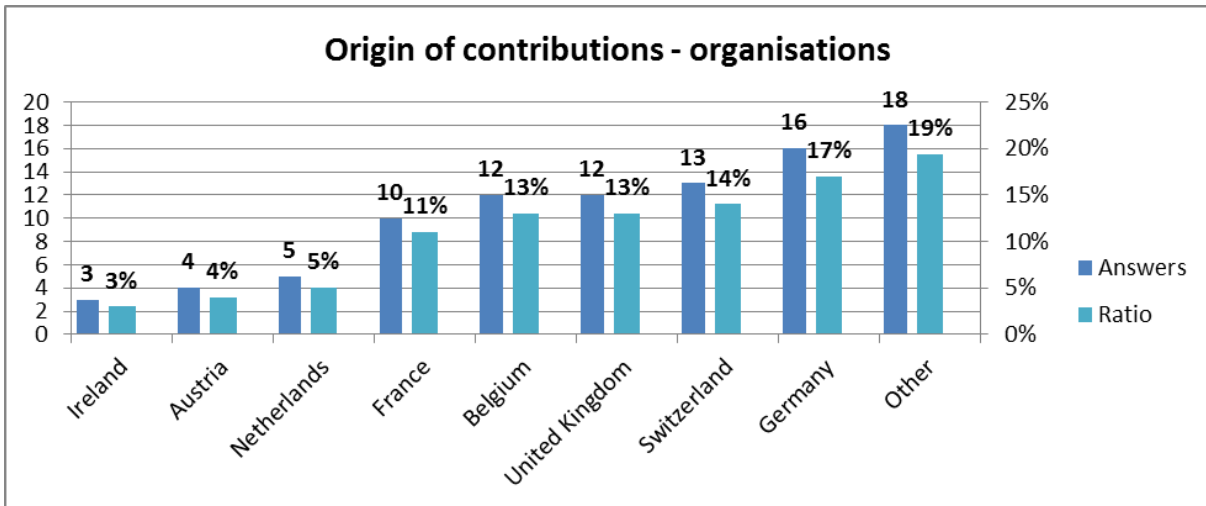
In total 330 valid contributions were submitted, including 12 general comments (4%¹), 225 contributions from individuals (68%) and 93 contributions from organisations (28%). Amongst the contributions from organisations, 9 were coming from National Aviation Authorities (NAAs). In addition to NAAs, a contribution was also submitted by EUROCONTROL.

Contributions from organisations included 20 from large enterprises, 15 from SMEs and 21 from microenterprises. Overall contributions from enterprises constituted 60% of all submissions from organisations.



In terms of geographical distribution of contributors, the vast majority of submissions from individuals came from Germany (47%), followed by Switzerland (20%) and UK (13%).

¹ Note: Some of the percentages may not add up to 100% due to rounding of figures.



When it comes to geographical distribution of submissions from organisations, nearly 70% of all contributions came from five States: Germany (17%), Switzerland (14%), United Kingdom (13%), Belgium (13%) and France (11%).

B. ISSUES TO BE ADRESSED

The subsequent part of this summary document contains an overview of the responses to the questions included in the survey. This overview consists of the statistical presentation of the replies to the multiple choice questions, as well as a summary of the main responses submitted by respondents as 'free text'. The replies to the multiple choice questions have been split into NAAs, all organisations (which includes also NAAs), and individuals.

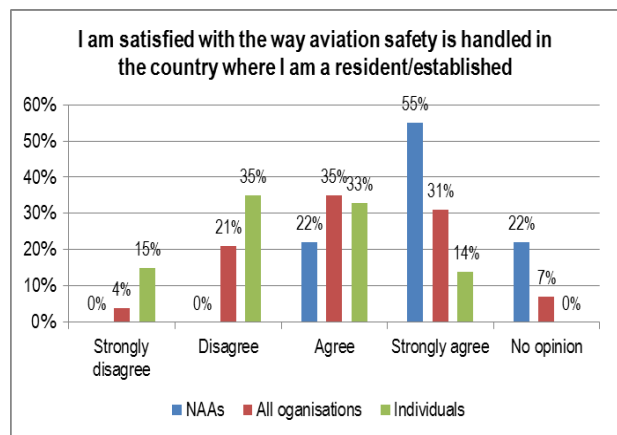
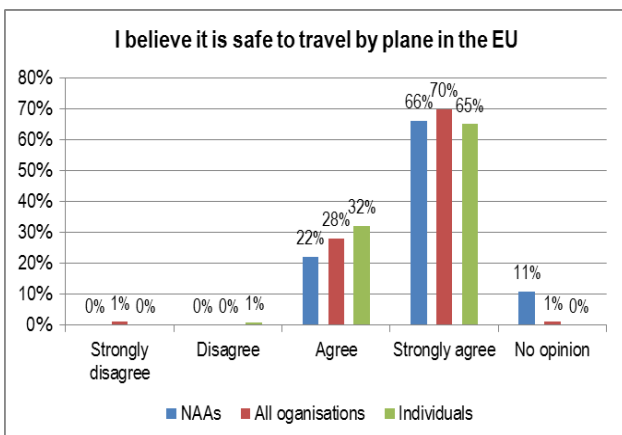
Due to the overly represented population of individual submissions from German private pilots, for some of the questions the results have been also compared with the population of individual responses which did not contain submissions from Germany.

a. Overall satisfaction

Overall there is a strong agreement amongst all the categories of respondents (organisations: 98%; NAAs: 88%; individuals: 97%) that aviation safety in the EU stands at present at a very high level.

Overall, the majority (66%) of the organisations which responded to the questionnaire are satisfied with the way aviation safety is managed in the country where they are established. A deeper analysis of the 25% of the organisations which responded that they are not satisfied revealed that nearly half of them (42%) are microenterprises employing less than 10 persons.

The satisfaction with the way aviation safety is managed is visibly lower amongst the individuals, where 50% of respondents responded that they are not satisfied with the current state of affairs. This relatively high level of unsatisfied individual respondents is maintained also when the contributions from private pilots from Germany are excluded from the analysis (52% satisfied; 46% not satisfied).

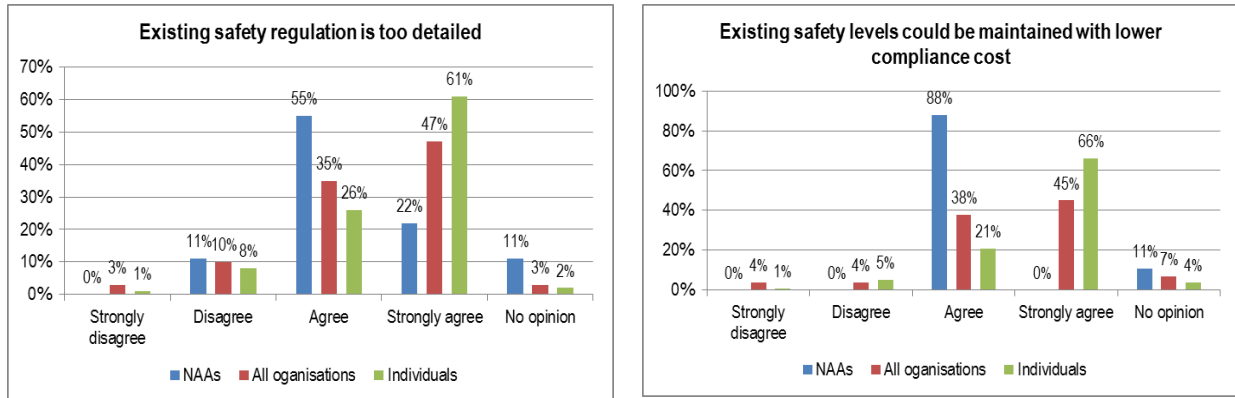


Some NAAs pointed out that while the present safety levels are satisfactory, this should not distract the regulators from focusing on maintaining this good safety record in the future.

b. Specific Problem Areas

i. Level of regulation

Both the majority of the respondent organisations (82%) and the majority of the individuals (87%) stated that the existing safety regulation is too detailed, and that the existing safety levels could be probably maintained with lower compliance costs (83% of the organisations; 87% of the individuals). The respondent NAAs largely share these views.



Many of the contributing organisations were of the opinion that the current complexity of the regulations is beyond the capability of the operators to understand and manage effectively, and that this in itself may present a risk, as organisations tend to overly focus on demonstrating compliance with the requirements instead of managing safety.

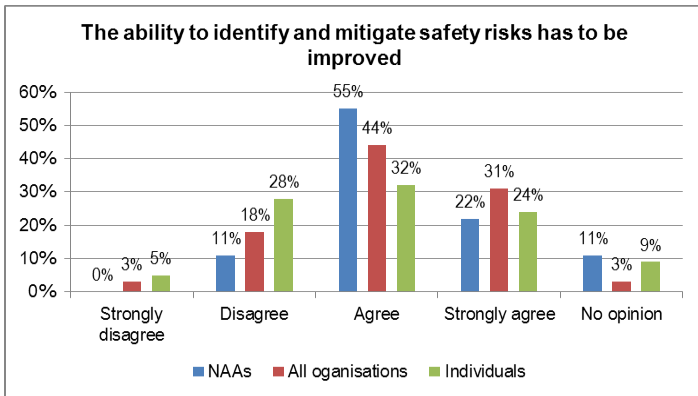
The contributors from the General Aviation community especially were of the opinion that impact assessments are not thorough enough and the effect of regulations on aviation safety is not being sufficiently evaluated, and that this results in requirements which are disproportionate to the risk or even not addressing the right risks. More generally the present requirements for non-commercial flying are considered as too onerous and costly compared to the achieved safety benefit. Many contributors suggested that the present definition of commercial operation should be reviewed.

It was pointed out by some of the contributors that North America achieves a similar safety level to EU, but with a much lower regulatory and financial burden upon its industry.

It was also pointed out by many of the organisations that aviation authorities (both at EU and NAA level) have inconsistent interpretations of the requirements. It was felt by contributors that some of the interpretations are more restrictive than the original intention of the rule.

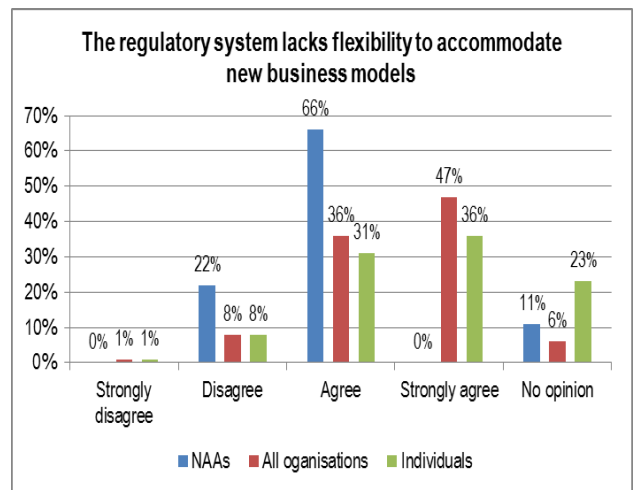
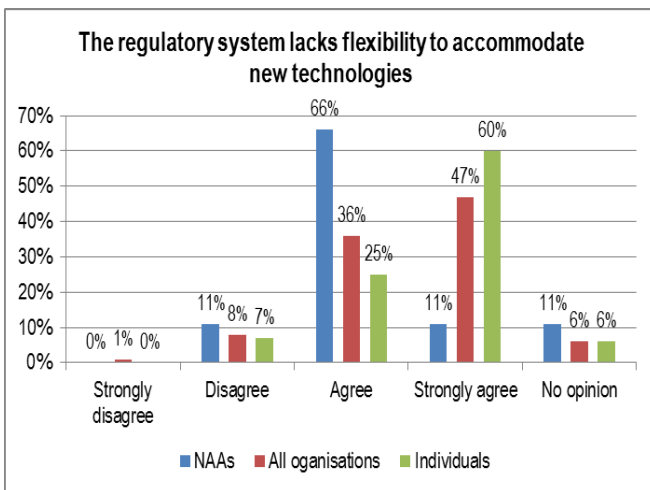
ii. Ability to identify risks and to accommodate new technologies and business models

While a clear majority of NAAs (77%) and of the respondent organisations in general (75%) agree that the ability of the EU to identify and mitigate safety risk must be improved, there is also a group of organisations (21%), which disagree. An analysis of the latter group did not reveal any particular pattern in its composition. 56% of individual respondents believe that the ability of the EU to identify and mitigate safety risk must be improved, while 34% of the individuals disagree.



The large majority of all categories of respondents agree that the current system lack the ability to accommodate new technologies and new business models. As far as technologies are concerned, RPAS has been mentioned as an example by many of the organisations and NAAs.

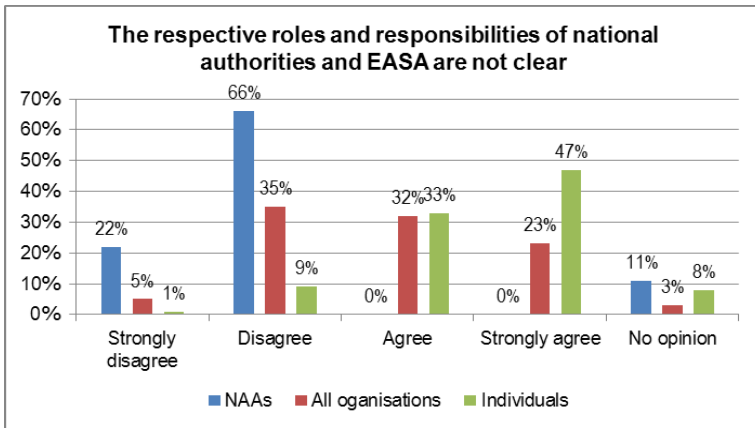
At the same time, the representatives of the aviation employees expressed their concerns about the possible negative impact of new business models on aviation safety and working conditions.



With respect to the new business models, some NAAs and industry organisations suggested that rather than trying to restrict them, the rules should be broad enough to safely accommodate them. It was also felt by some NAA respondents that the new business models may put additional strain on oversight resources of competent authorities.

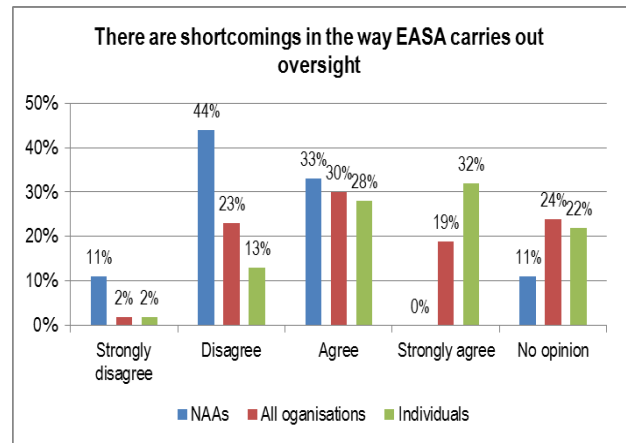
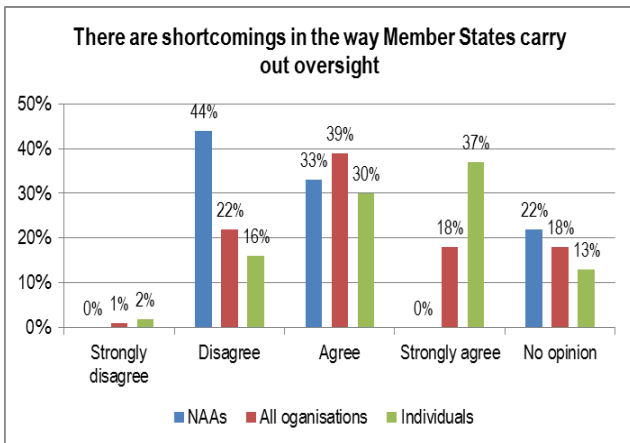
iii. Clarity of roles and responsibilities

The division of responsibilities between NAAs and EASA are clear for the Member States. On the other hand for 56% of the respondent organisations, the division of the respective roles and responsibilities of NAAs and EASA are not clear. When it comes to individuals, 81% of them responded that the roles and responsibilities of NAAs and EASA are not clear.



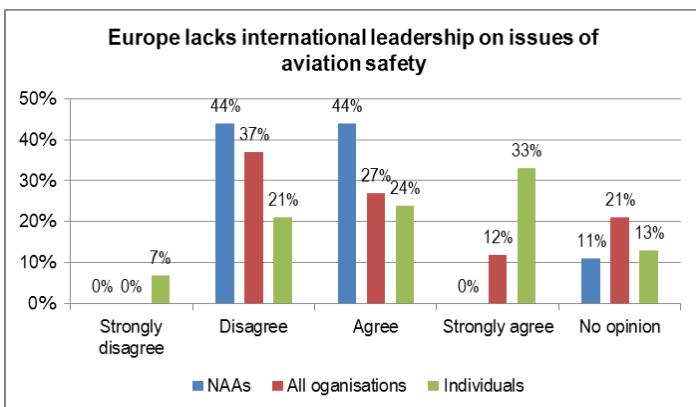
iv. Ability to carry out oversight by NAs and EASA

57% of organisations responded that there are shortcomings in the way Member States carry out oversight. 49% of the respondent organisations are also of the view that there are shortcomings in the way EASA carries out oversight. When it comes to individuals, 67% of the respondents identified shortcomings in the national authority oversight, and 60% in EASA oversight. Most of the NAs which responded do not see shortcomings in national and EASA oversight.



v. International leadership

There are split views amongst respondents as to the EU international leadership on aviation safety. While 41% of organisations believe that EU lacks international leadership, 37% disagree with such a statement, and 21% have no opinion at all. The opinions of the NAs are split half-half.

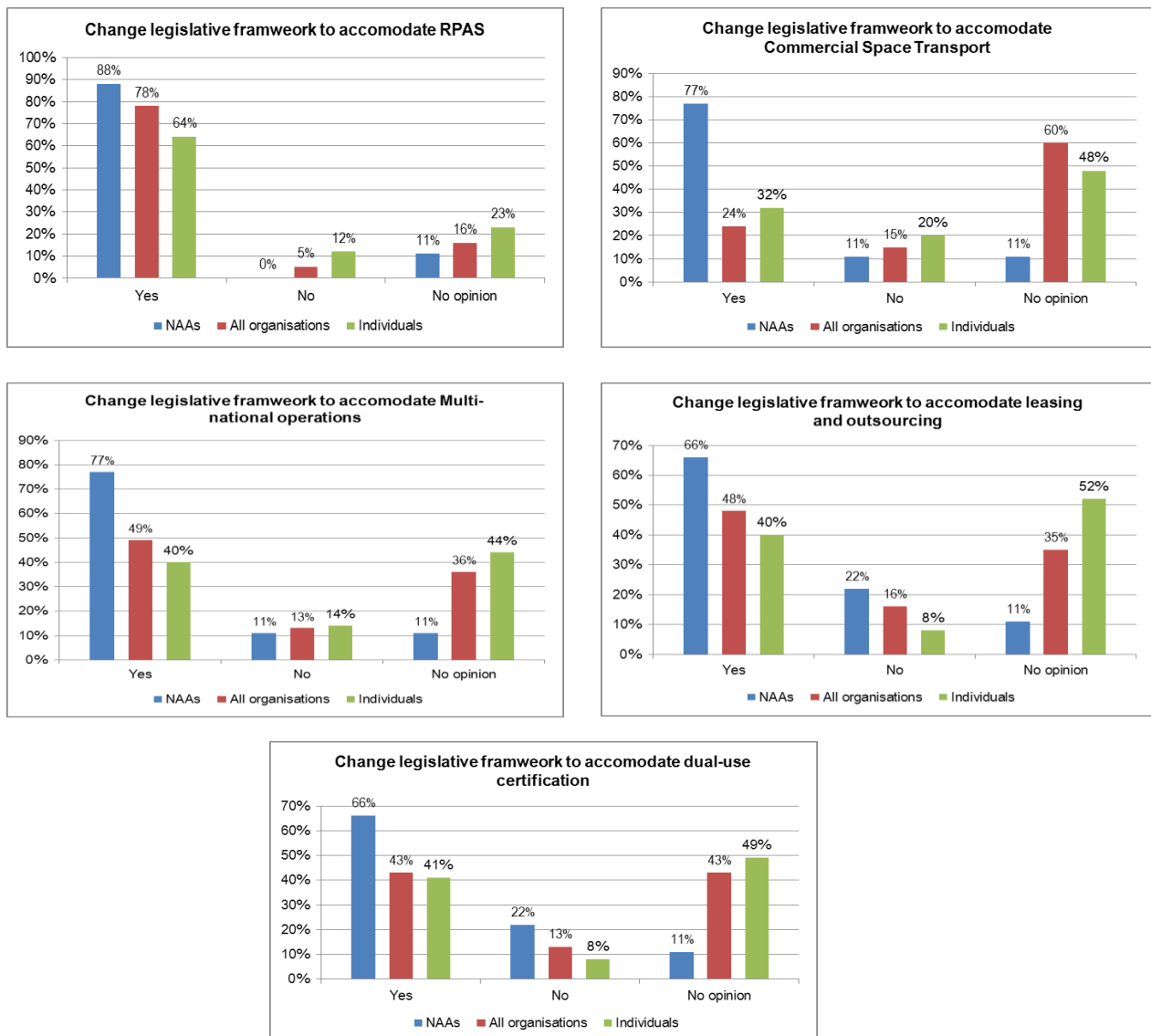


vi. Scope of the present rules

There is a very clear agreement amongst all the categories of respondents that the current legislative framework needs to be adjusted / extended to accommodate RPAS. When it comes to Commercial Space

Transport, the majority of the organisations (60%) were not able to express an opinion, while 77% of respondent NAAs see a need for a regulatory action in this respect (either at EU or ICAO level).

When it comes to multinational operations, outsourcing/leasing, and dual-use certification, the respondent organisations in general and NAAs in particular tend to lean towards a need for a regulatory action. There is a large percentage of individuals which do not have an opinion on these rather specialised issues.



As regards other aspects related to potential changes in the scope of the EU rules, following main trends can be observed in the contributions received from organisations and NAAs:

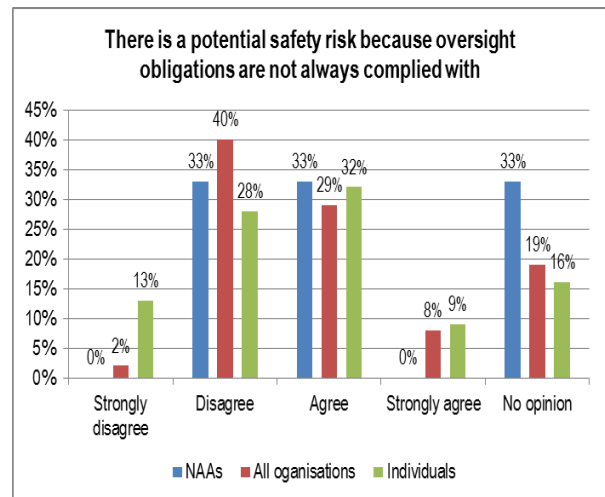
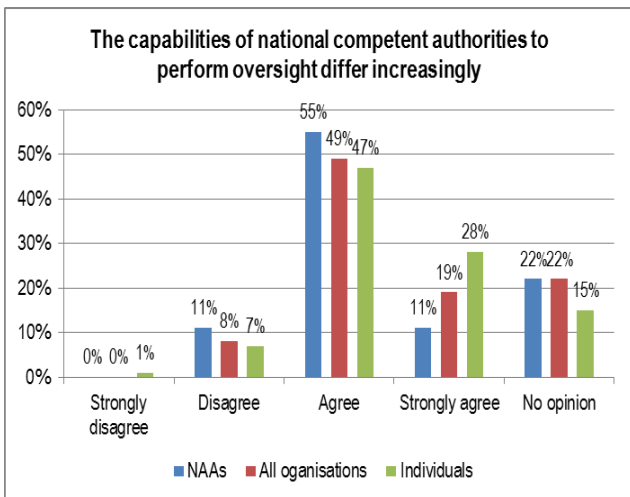
- Airports and transport workers suggest the inclusion of the ground-handling services into the scope of EU regulation. The air operators which submitted contributions and their representatives were also in favour of addressing ground-handling by the present initiative. The views amongst authorities on this issue were divided;
- Many of the organisations suggested that it should be possible for NAAs and EASA to certify state aviation activities and aircraft (such as used by police or firefighters), according to civil rules;
- Some of the organisations, especially from the General Aviation sector, suggested that the scope of Annex II to Regulation 216/2008 should be extended, and that leisure and sport aviation would be better regulated at the national level;
- Concerning security issues, the views between organisations were rather split, with some of the contributors advocating a more integrated approach, with safety and security regulated together, while other contributors advised caution arguing that the current arrangements for security are appropriate and that any changes could have negative consequences. Those stakeholders which

were in favour of including security aspects within the scope of Regulation (EU) 216/2008, would like them to be limited to technical issues such as cyber-security or aircraft design.

vii. Capabilities and resources of national authorities and EASA

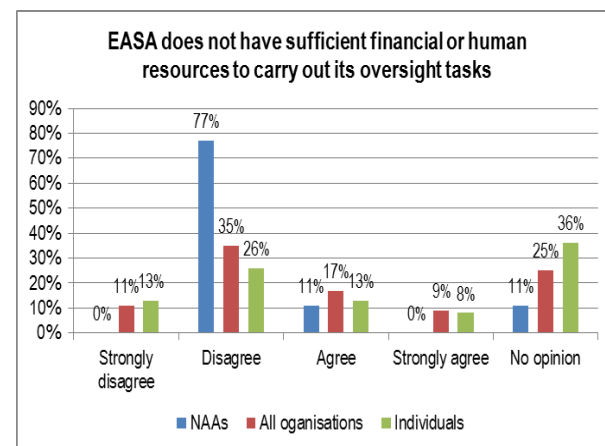
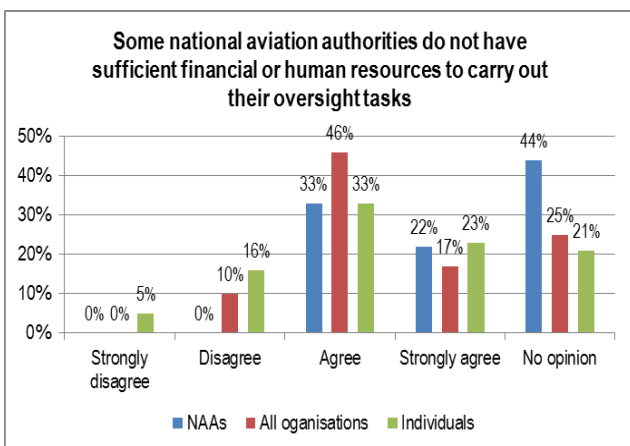
There is a large agreement between all groups of respondents that the capabilities of national aviation authorities to perform oversight differ increasingly. At the same time there is no clear position amongst respondents whether there are potential safety risks because oversight obligations are not always complied with.

There is quite a clear majority amongst the respondents that some national aviation authorities do not have sufficient human or financial resources to carry out their safety oversight tasks. Over half of the respondent NAAs share this view (55%). On the other hand nearly the majority of the respondent organisations (46%) in general, and most of the respondent NAAs (77%) believe that EASA has sufficient financial and human resources.



A point made by a number of organisations with regard to differing capacities of the authorities was that this difference largely stems from the fact that authorities do have differing volumes of aviation activity under their responsibility, and that it would be unrealistic to expect all the authorities to be at the same level. At the same time one of the main concerns of the industry is that the differing capabilities of the national authorities can result in a lack of playing field on the market.

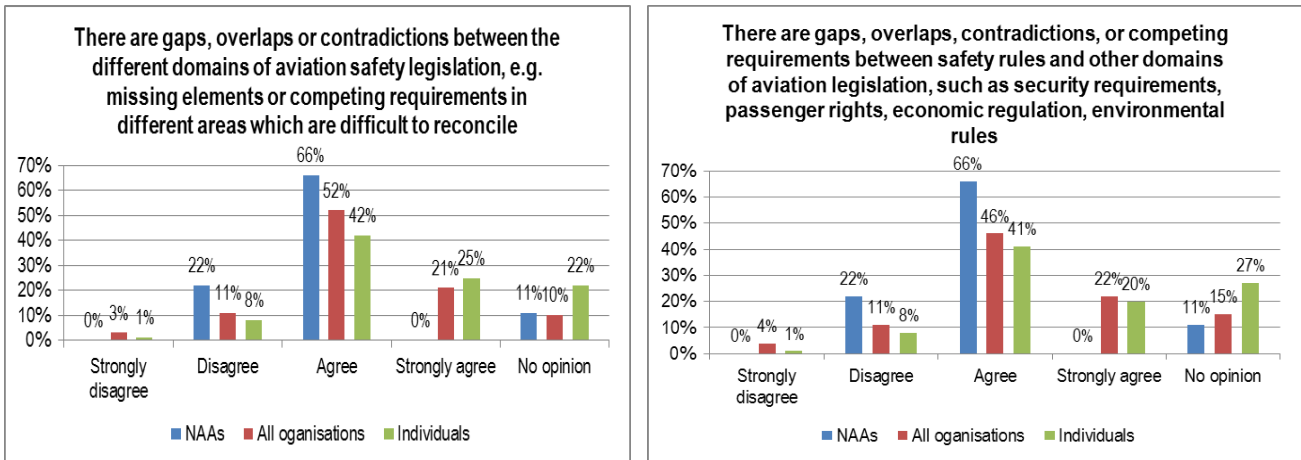
Many contributions underlined the need for authorities to have first-hand experience and expertise deriving directly from the industry in order to be in touch with the realities of the market, understand changes in operational practices and be up to date with the latest technologies. The General Aviation community in particular believes that EASA lacks understanding of their sector.



The aeronautical manufacturing industry has stressed the need for EASA to have adequate resources to ensure efficient certification of the new aeronautical products that are expected to be developed in the coming years.

viii. Consistency of the present regulatory framework

A clear majority of the respondent organisations (73%) pointed out that there are gaps, overlaps or contradictions between the different domains of aviation safety legislation. Similarly there was a clear majority of respondent organisations (68%) which believe that there are gaps, overlaps, contradictions, or competing requirements between safety rules and other domains of aviation legislation. These views were shared by the respondent NAAs and individual respondents.



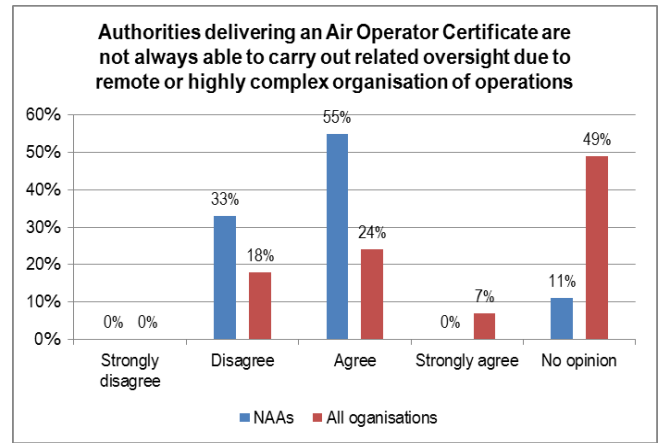
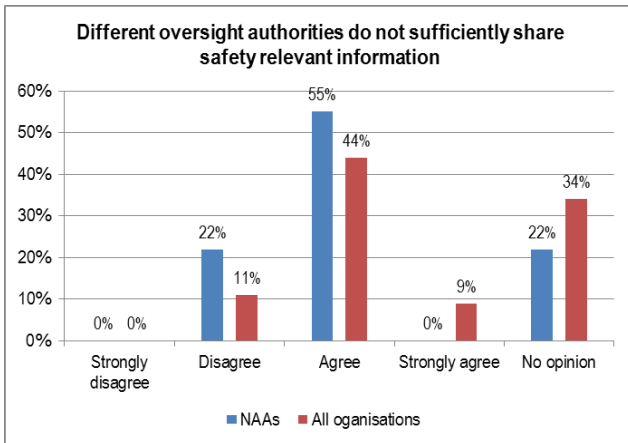
Some of the most common examples of inconsistencies and gaps pointed out by the respondents include:

- Inconsistencies between requirements for airborne and ground-based components of the ATM system. Especially many ANSPs believe that the risk of such inconsistencies is big for the SESAR deployment phase.
- The inconsistencies between the occurrence reporting obligations in the present EASA implementing rules and the new EU regulation on occurrence reporting;
- Absence of a common framework for RPAS, and lack of coordinated response to emerging cyber-security threats;
- Inconsistencies between safety requirements and the EU chemicals regulation (REACH);
- Inconsistencies stemming from varying interpretations of EU requirements by different EU Member States;

ix. Exchange of information and oversight of complex AOC arrangements

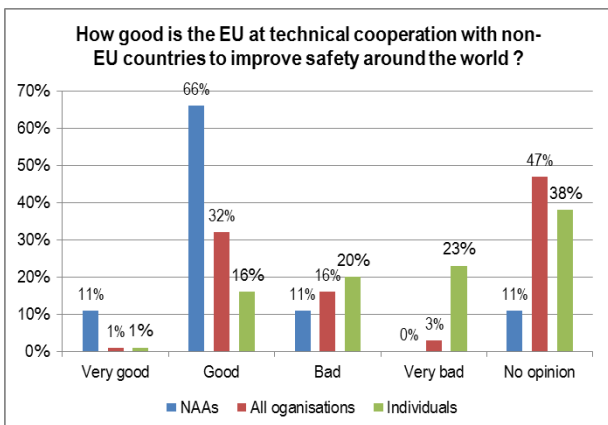
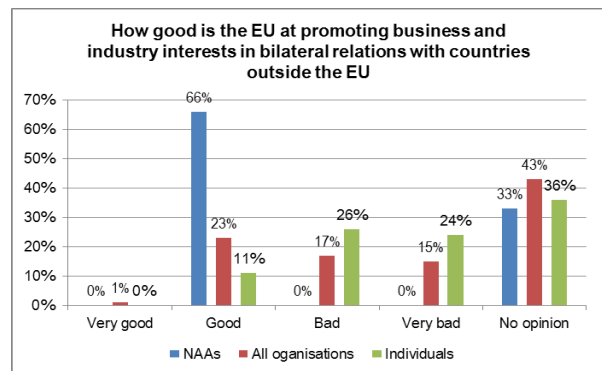
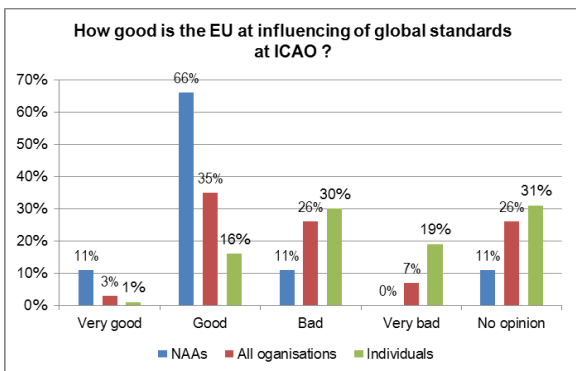
While the majority of the respondent organisations (53%) believe that the oversight authorities do not sufficiently share safety relevant information, they were not able to give a clear opinion whether the complexity or geographical remoteness of the operation hampers the ability of AOC oversight by national authorities.

The majority of the respondent NAAs (55%) believe that not only safety information is not sufficiently shared between the authorities but also that the authorities may not always be able to exercise AOC oversight due to remote or complex characteristics of the operation.



x. EU interests at international level

Views were almost equally split on whether the EU is successful in influencing international standards at ICAO level, with 38% of responding organisations agreeing that Europe is successful in this respect, 33% that not successful and 26% not having opinion at all. When it comes to the evaluation of EU's success in promoting the business interests overseas, and in supporting foreign countries in raising their safety levels, nearly half of the respondent organisations were not able to give an opinion. Respondent NAAs were largely satisfied with the level of influence the EU has at the international level.



More specifically the following main trends can be observed in the contributions submitted:

- The manufacturing industry stresses the need for more reliance on BASA agreements to reduce redundant certifications and oversight. The manufacturing industry would also like to see EASA more present in the key markets and in ICAO, in order to promote the EU way of thinking on aviation safety and facilitate the export of aeronautical products;
- Many industry contributors see a need for close cooperation with the US, which at the same time is seen as a competitor;

- While the airline representatives underline the need for as close alignment with ICAO SARPs as possible, the ANSPs caution about blindly following the ICAO Annexes which may be sometimes outdated or not adapted for the EU operational environment;
- While the need for coordination in representing EU interests abroad is widely recognised, many contributors believe that this should not be interpreted as speaking with 'single voice', and that 'multiple voices signing from the same hymn-sheet' would be more effective;

c. Subsidiarity of EU action

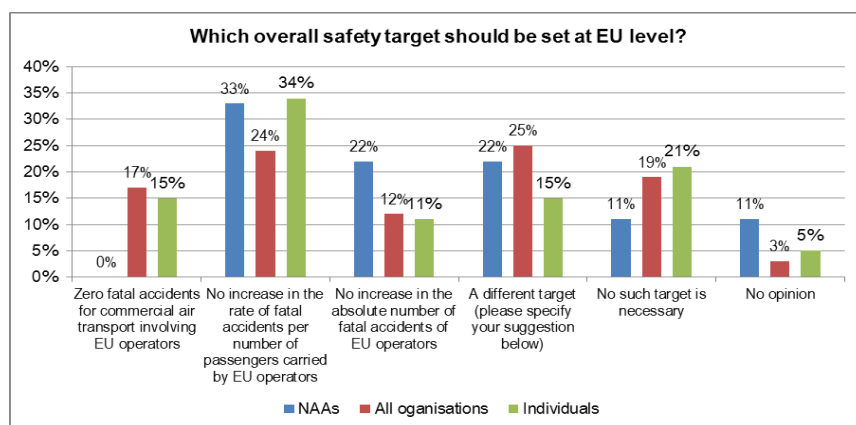
In the context of aviation safety regulation, the following main trends emerge from the contributions as regards subsidiarity of EU action:

- As a matter of principle, EU regulation is justified where it is necessary to ensure a level playing field on the internal market, or where the risks to be addressed concern more than one Member State;
- Operation in special local environments, such as mountainous regions, should be allowed on the basis of national rules or exemptions from common EU standards;
- A number of organisations suggested that sport and recreational aviation, especially with balloons and gliders, could be better regulated at the national than EU level. There were however submissions, suggesting that instead of reverting back to national approaches, the EU regulatory system for light aviation should be improved, and/or a choice given to the operators / manufacturers whether they would like to be under the EU or national system;
- Many helicopter operators suggested that commercial operations with helicopters should be regulated at national level.
- Many of the General Aviation organisations were of the opinion that more responsibility should be devolved from the authorities to competent users' organisations and individuals;

d. Policy objectives

i. The need for an EU target on aviation safety

Views were split with respect to the need to have an EU target for aviation safety. The largest proportion of the respondents was of the view that as a minimum the EU should be able to freeze the current rate of fatal accidents.



Main arguments in favour and against target setting were as follows:

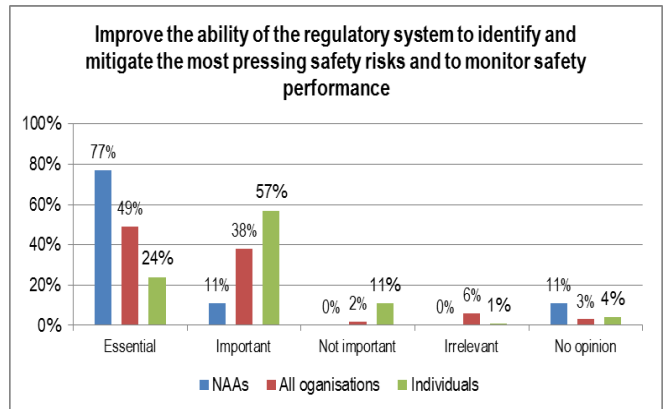
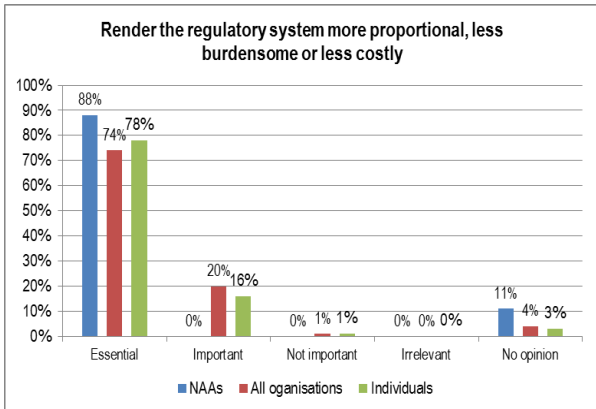
- Setting an overall safety target is too vague and could be at best considered as an aspirational objective. Targets should be set individually at the level of the organisation which has the most practical overview of the situation;
- While setting targets could be acceptable for Commercial Air Transport, General Aviation should not be subject to target setting;
- Safety targets should be set with respect to each domain of aviation and based on different acceptable levels of safety performance;

- Target setting can result in unintended safety consequences;
- 'Absolute' safety targets are unrealistic. Continuous improvement is a much better indicator of progress made;

ii. Key policy objectives, as perceived by stakeholders

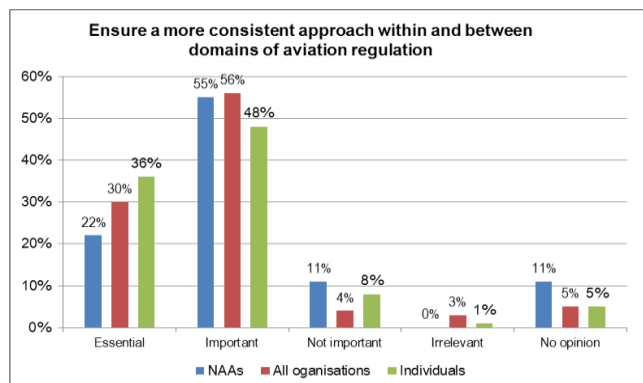
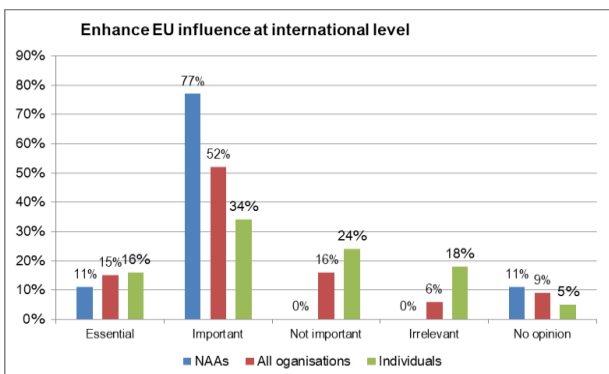
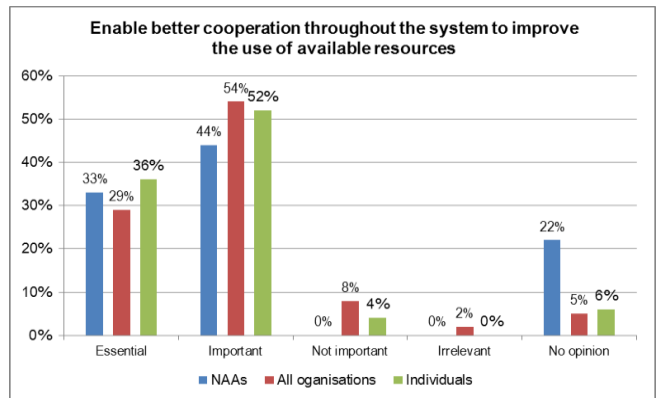
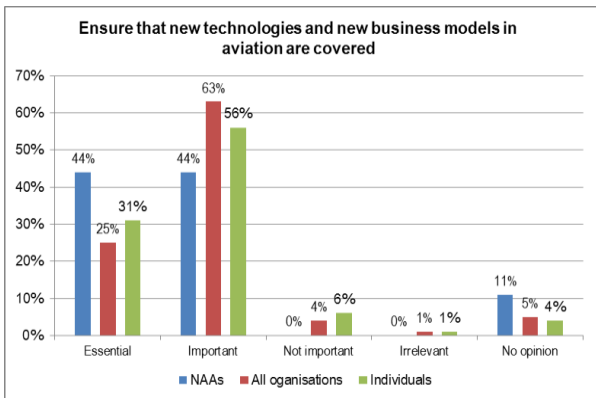
Overall the respondents have agreed with the main objectives as suggested by the Commission. In particular there was almost a unanimous agreement between all the categories of respondents that the present regulatory system should be made more proportional and less costly.

The improvement of the ability of the system to identify and mitigate safety risks has been also rated as a particularly important objective, especially by the respondent organisations and NAAs more specifically.



With respect to the future shape of the regulatory system, a large number of industry and NAA contributions suggested that rules should focus more on the safety objectives rather than prescribing in detailed the method of compliance, which should be up to the operators to choose.

ANSPs and other stakeholders from the ATM sector advocated that EASA should be the only body in the EU responsible for setting safety requirements.

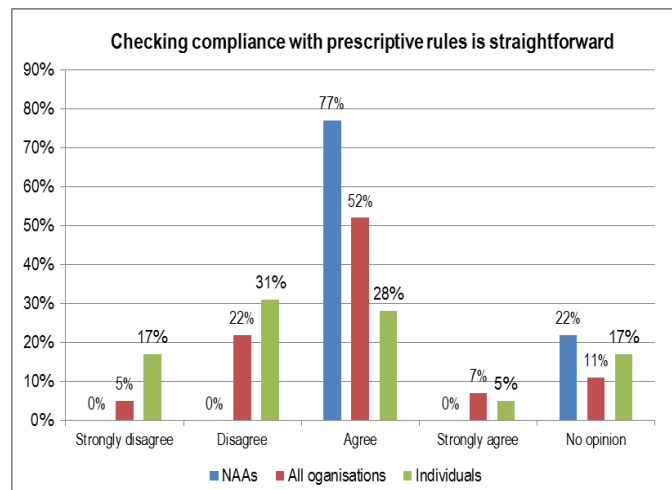
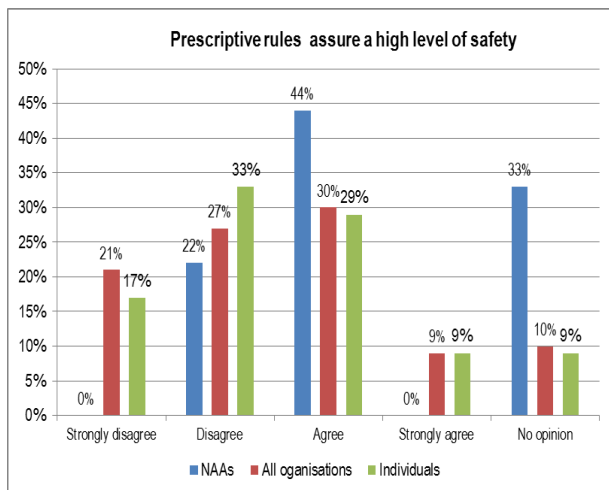
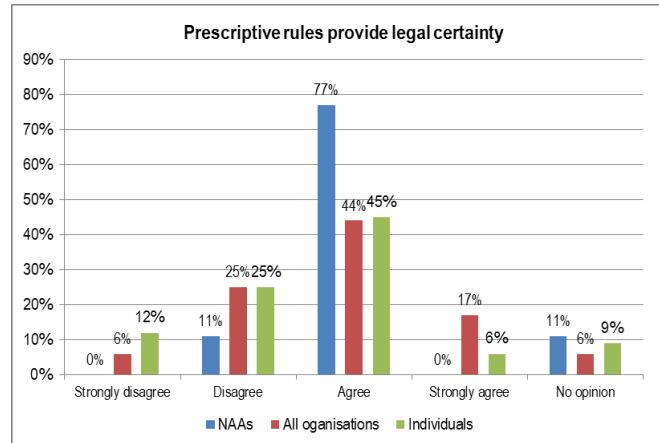
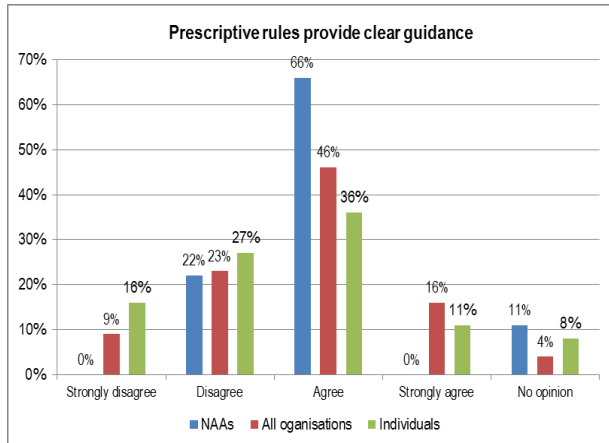


e. Policy measures

i. Regulatory system

⇒ Benefits of prescriptive regulations

The respondents have largely agreed with the Commission as to the benefits provided by the prescriptive regulations (clear guidance, legal certainty and straightforward compliance checking). However, views were split on whether the prescriptive regulations actually ensure a high level of safety, with 48% of all organisations and 50% of individuals disagreeing with such a statement.

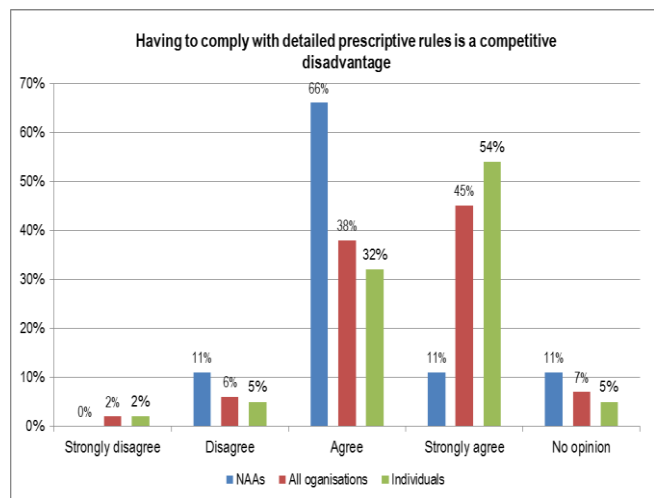
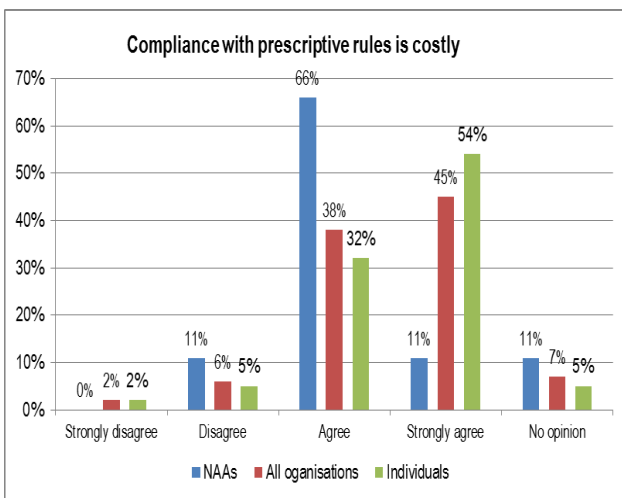
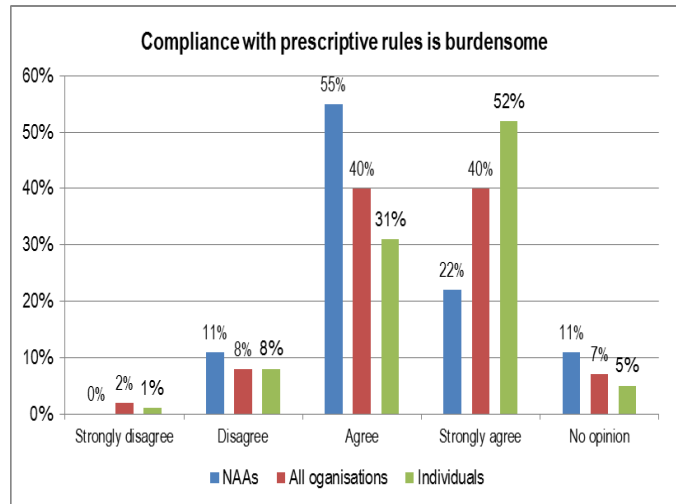
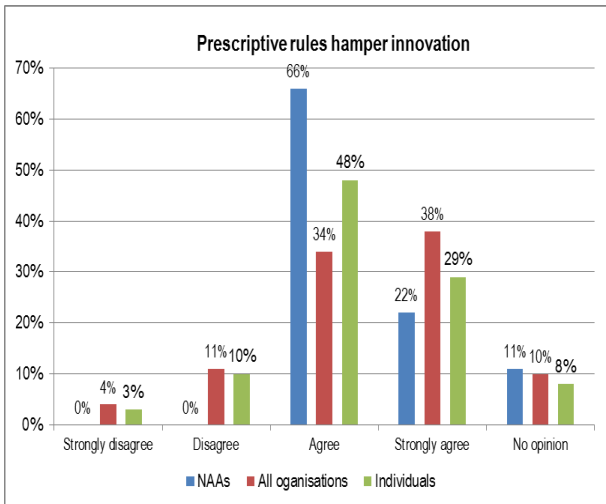


A thread that was present in many of the contributions is that while the prescriptive safety rules have helped to achieve the present high level of safety in Europe, the most important factors are commitment and professionalism of people and organisations, and that following the rule alone does not guarantee safety.

It was also highlighted in many of the contributions that EU is overly relying on regulation and that other means should be added to the EU's safety management 'tool-box' including safety promotion and support for training and implementation.

⇒ Shortcomings of prescriptive regulations

All the categories of respondents have similarly agreed with the statements made by the Commission with respect to the shortcomings of prescriptive regulations, which are perceived as hampering innovation, costly and burdensome.

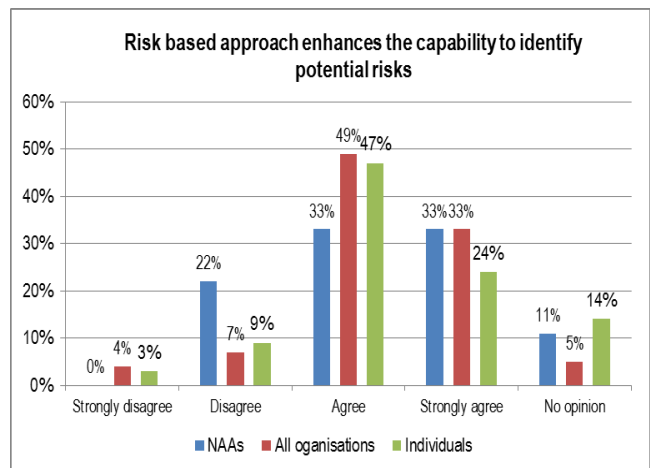
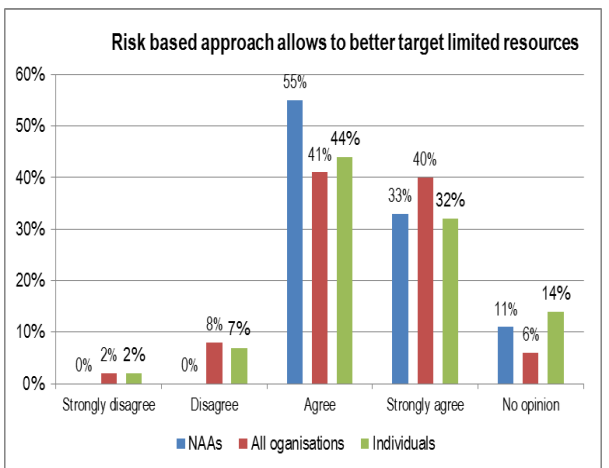
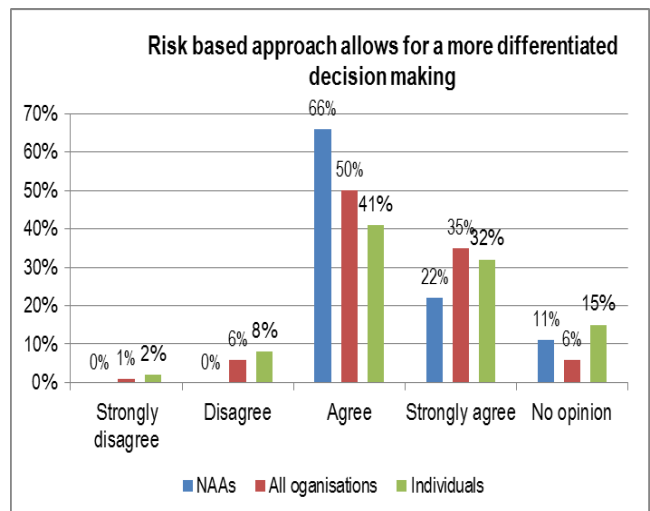
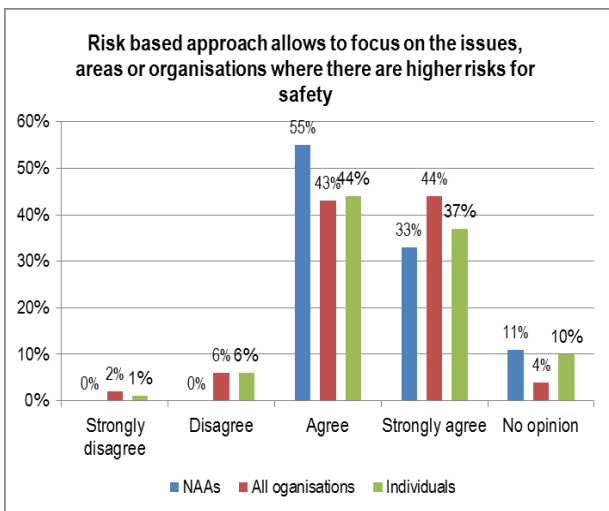
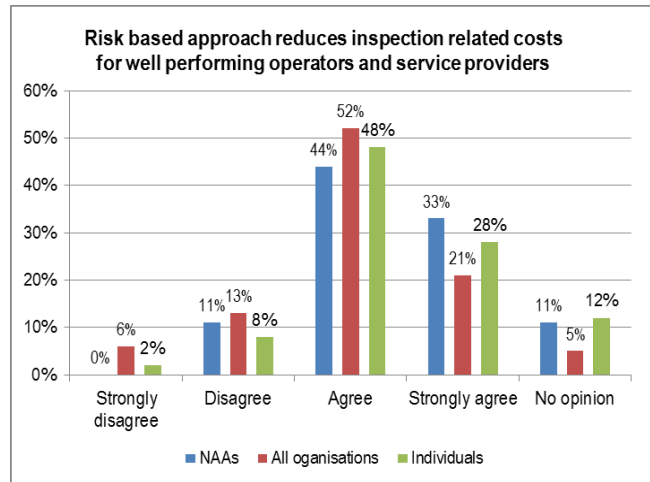
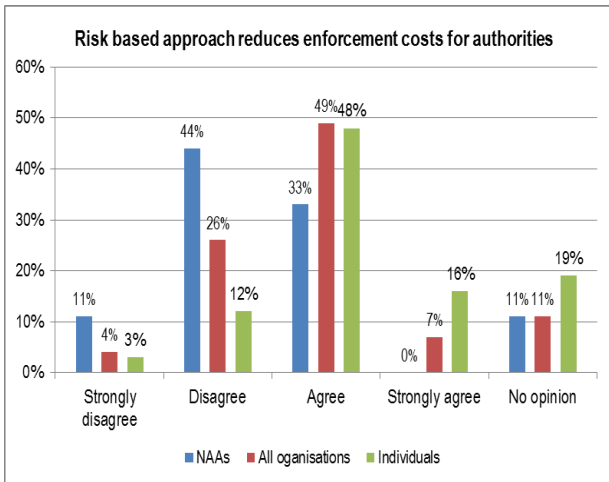


While the respondents identified a number of shortcomings of prescriptive regulations, many of them felt that there is a place for both prescriptive and performance based regulations. For many of the respondents the added value of prescriptive rules is the knowledge about safety risks - often stemming from accidents - which prescriptive rules contain. Prescriptive rules are also felt more appropriate for organisations which have not reached maturity which allows them to manage safety through own risks assessments.

A number of respondents from the General Aviation community, while supporting a transition to more proportionate, performance and risk based regulatory framework, argued that in the first place there is a need to reassess whether in some domains there is a need for regulation at all.

⇒ *Benefits of a risk based approach*

When it comes to identifying benefits of a risk based approach, there has been a large degree of agreement amongst all the categories of respondents with the statements made by the Commission. However the majority of the respondent NAAs (55%) and nearly a third of all respondent organisations (30%) do not agree that a risk based approach allows reducing enforcement costs for authorities.

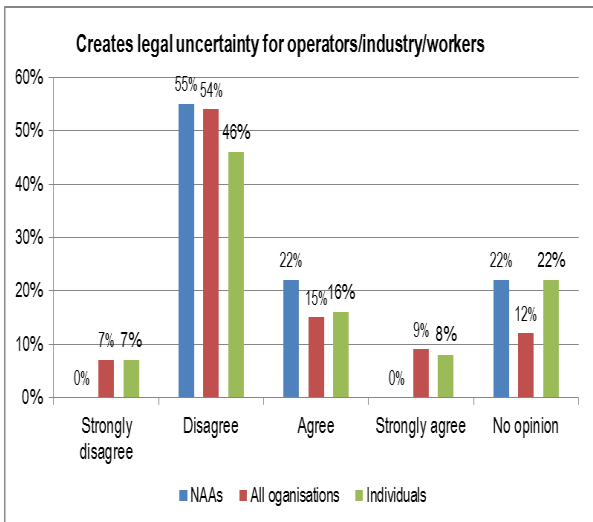
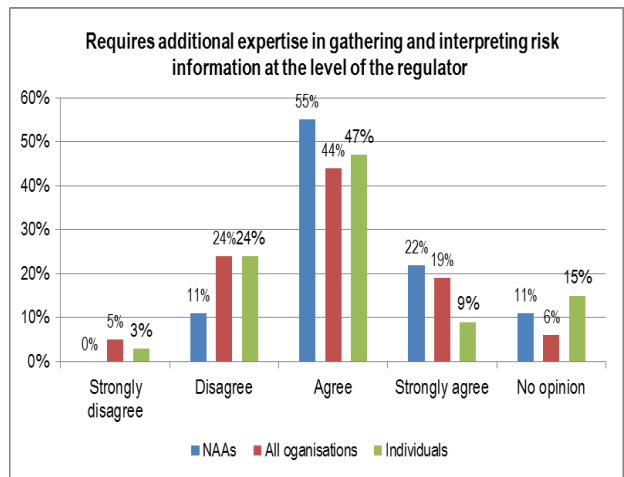
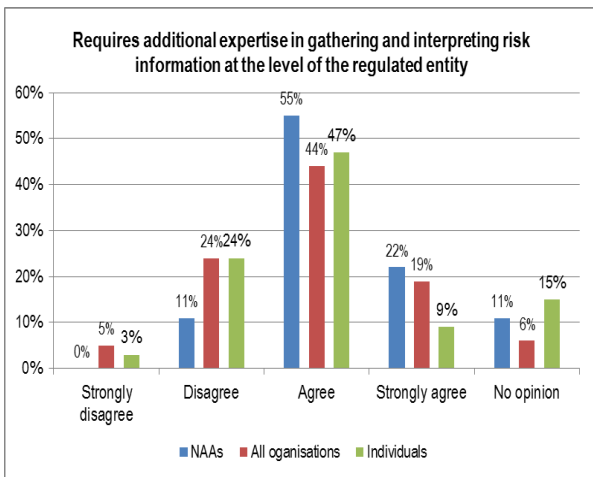
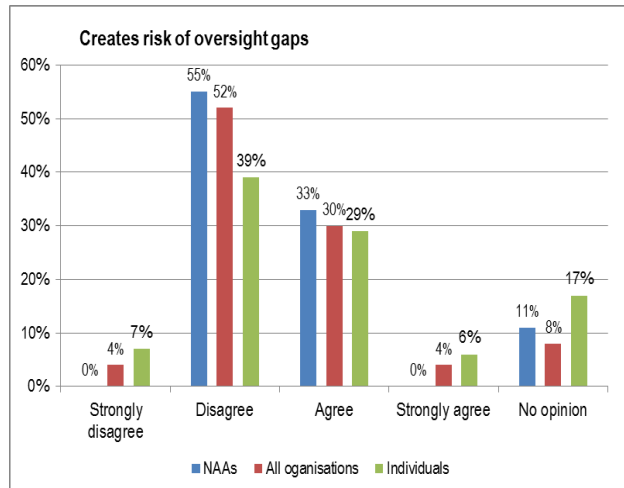
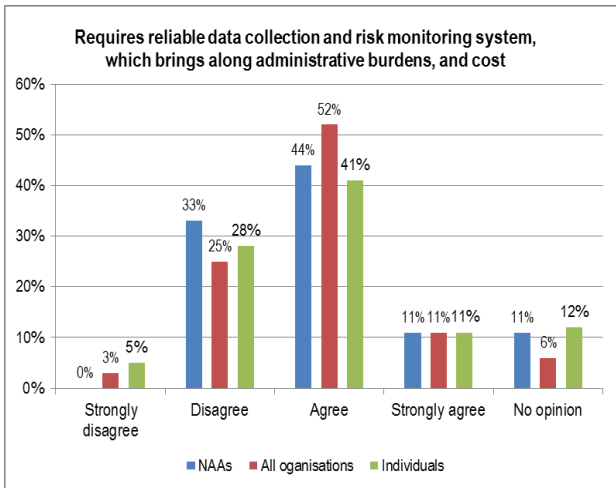


⇒ *Shortcomings of a risk based approach*

The majority of respondents in all categories agree that implementation of a risk based approach requires additional expertise in gathering and interpreting risk information, at the level of both the regulated entity and of the regulator. The majority of the respondent NAAAs (55%) and of the organisations in general (56%) believe that this new method can be implemented without risks of oversight gaps. However one-third of the respondents in each of the categories believe that such risks of oversight gaps do exist.

The majority of the respondents in each of the categories (55% NAAAs; 63% all organisations, 52% individuals) believe that implementation of a risk based approach creates additional costs and administrative burdens stemming from the need to put in place reliable data collection and risk monitoring systems. There is however also roughly a one-third of respondents in each of the categories, which believe that this not the case.

Finally, the majority of the respondents in each of the categories disagree with a statement that implementation of a risk based approach could create uncertainty for operators and employees, provided that such a new approach is well implemented.



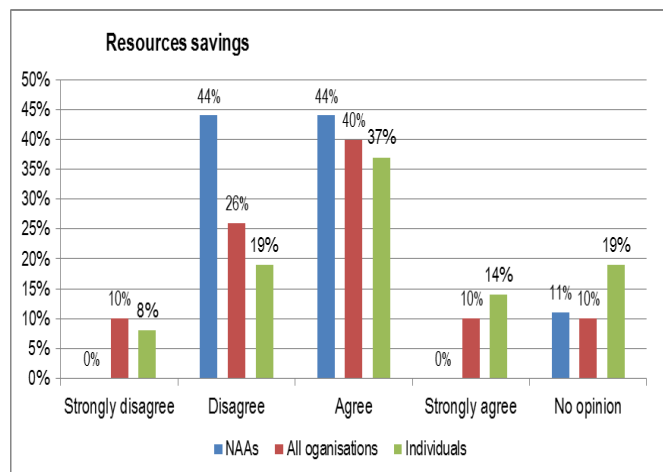
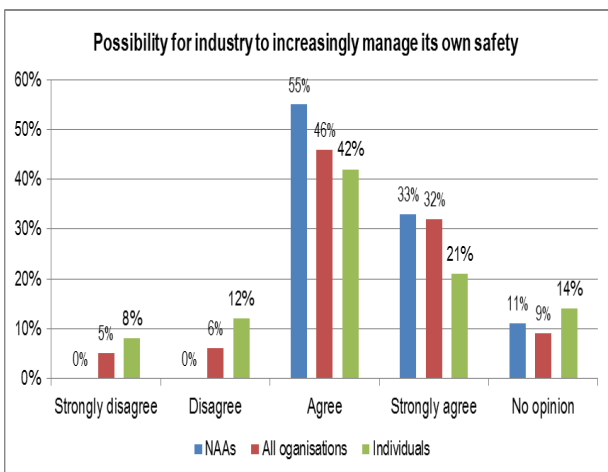
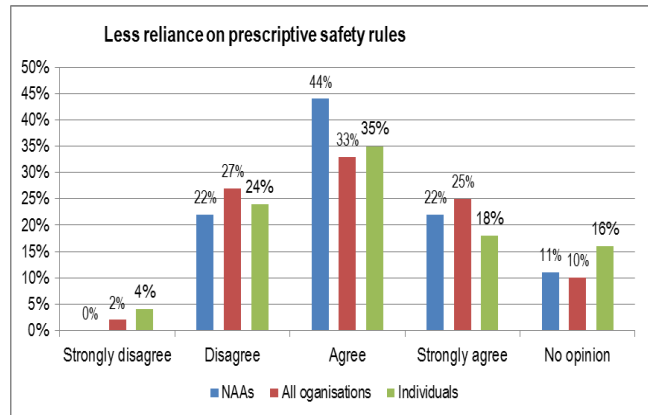
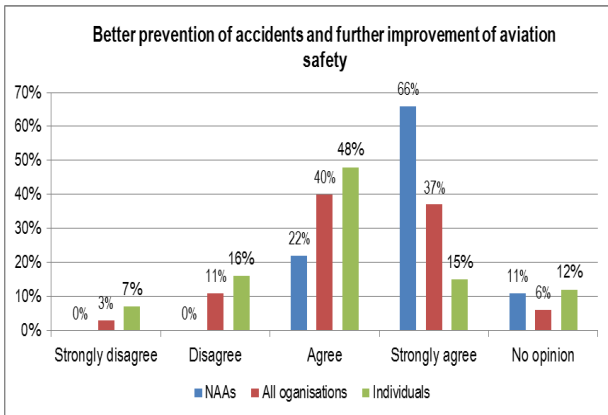
⇒ *Benefits of SMS*

There is a strong agreement between all categories of respondents that SMS allows better prevention of accidents and further improvement of aviation safety. Respondents are also very much in agreement with the statement that SMS should allow the industry to increasingly manage its own safety.

Views were however more split on the resource savings offered by SMS and on the possibility to rely less on prescriptive safety rules as a result of SMS implementation.

There were also two themes clearly present in the replies of respondents with respect to the SMS implementation:

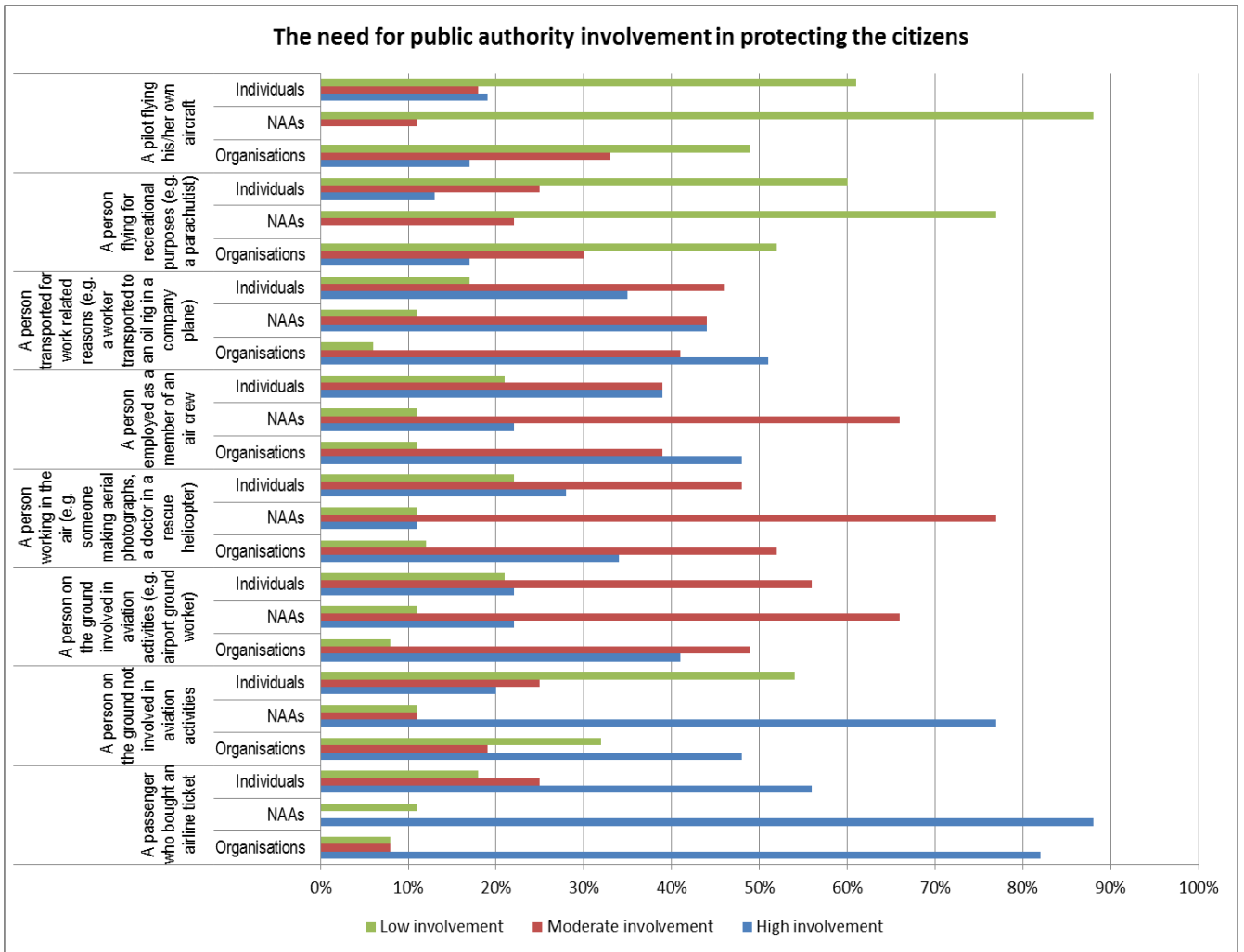
1. Genuine implementation of SMS takes time, and requires a cultural change within the organisation;
2. Smaller organisations and General Aviation community in particular expressed strong concerns about the added value of the SMS, compared to the costs required for implementation;



ii. The need for public authority involvement in protecting the citizens

The results of the responses to question related to the need for public authority involvement in protecting the citizens can be summarised as follows:

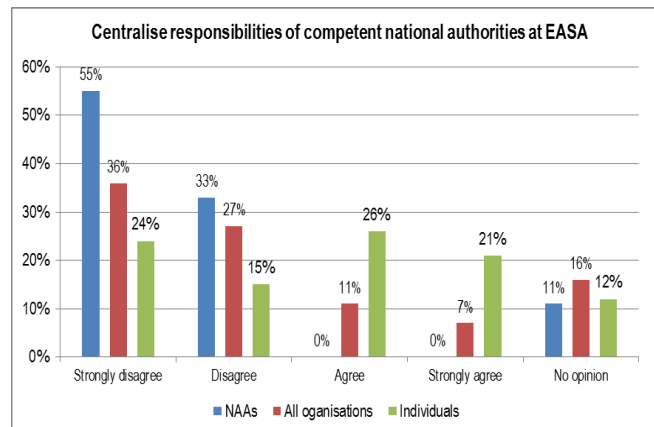
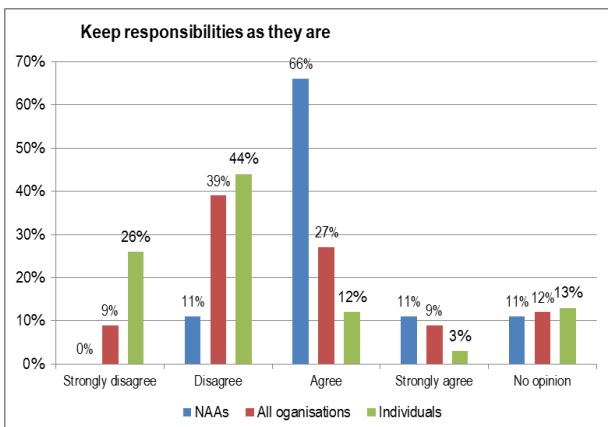
- There is an agreement between all the categories of respondents that the highest level of public authority involvement is necessary in case of airline passengers;
- The respondent organisations in general and NAAs in particular also agree that a high level of protection (through authority involvement) should be given to persons on the ground not involved in aviation activities. This view is however not shared by the responded individuals.
- According to the respondents, a high to moderate level of protection (through authority involvement), should be afforded to persons transported by air for work related reasons, and employed as members of air crew.
- A moderate level of protection (through authority involvement), should be afforded, according to respondents, to persons on the ground involved in aviation activities (such as airport workers), and persons working in the air (such as aerial photography).
- Finally there is a large degree of consensus that the lowest need for public authority involvement is justified in case of persons flying for recreational purposes such as parachutists, and private pilots;



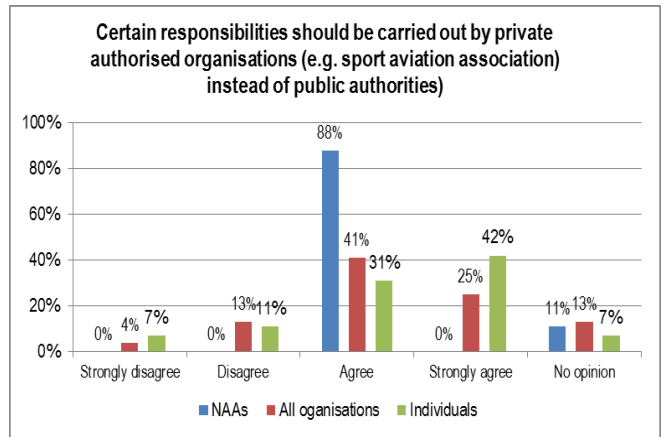
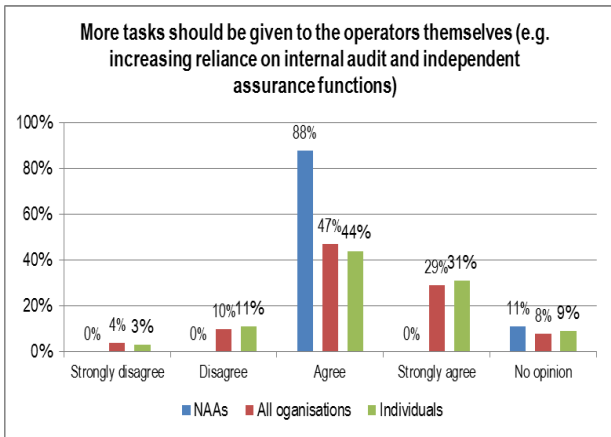
iii. Governance

With respect to the governance, the majority of the respondent NAAs (77%) would like to keep the current division of responsibilities between the EU and national level. On the other hand 48% of all the respondent organisations and 70% of individual respondents would like the allocation of responsibilities to be revisited.

There is a strong disagreement amongst respondent organisations (63%) and NAAs in particular (88%) with the proposition to centralise the responsibilities of national authorities at EASA.

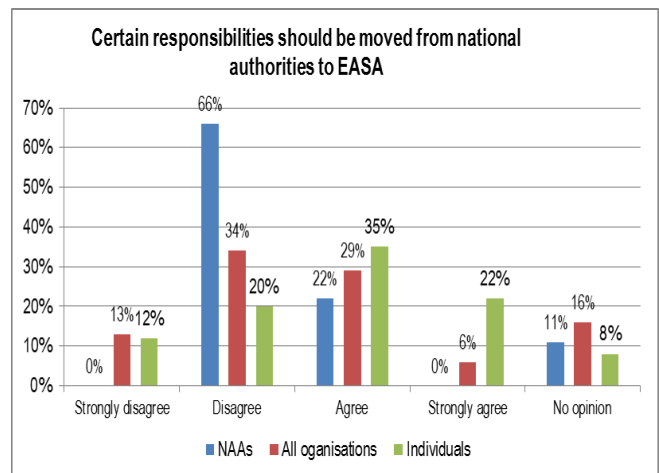
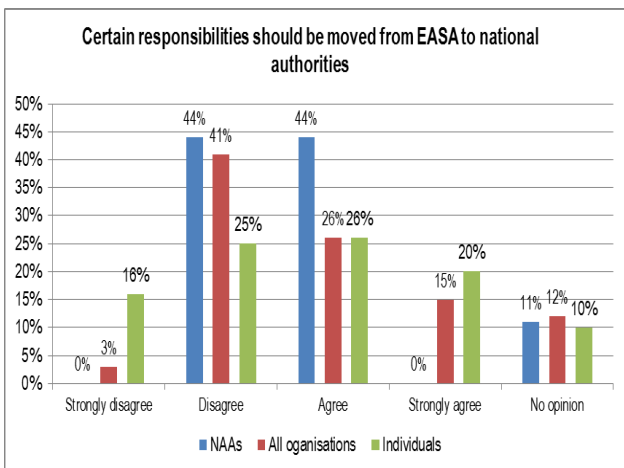


There is a very strong agreement between also the categories of respondents that more responsibility for safety should be given to the operators themselves, and that in the case of general aviation, certain regulatory tasks could be entrusted to specialised authorised private organisations, such as sport aviation associations.

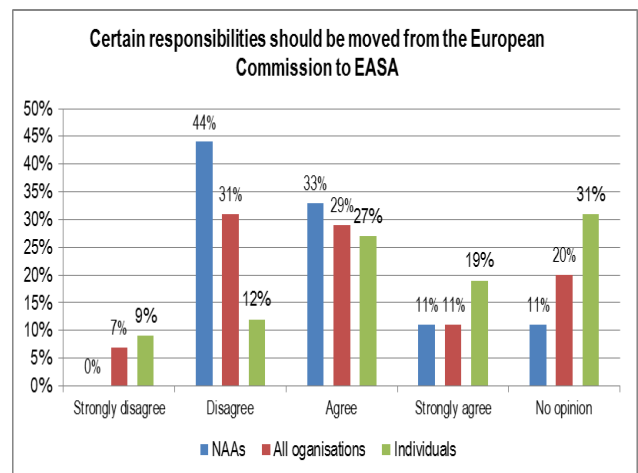
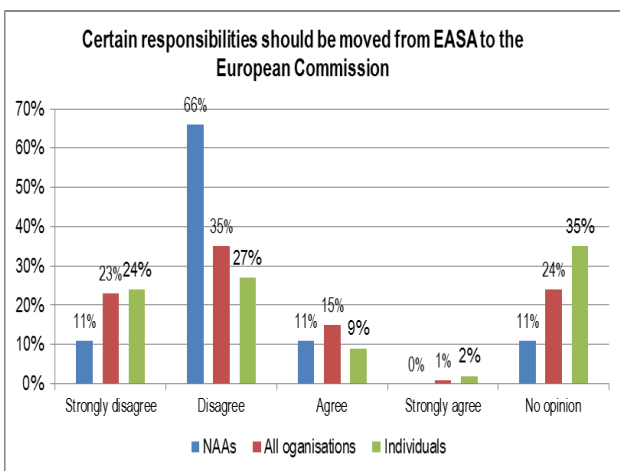


Views are almost equally split on whether certain responsibilities should be moved from EASA back to the national authorities. Similarly there are split views whether certain responsibilities should be moved from national authorities to EASA, but with the majority of the respondent NAAAs clearly against such a proposition.

Where proposals were made by the respondents that certain activities be regulated at the national level instead of EU level, that primarily concerned light and recreational aviation. The large manufacturing industry on the other hand would like to see the EASA regulatory remit extended. In those cases where respondents agreed that certain tasks should be moved from national authorities to EASA this was justified by reasons of harmonisation and standardisation. At the same time the industry recognised in their submissions the value of local proximity that the presence of national authorities gives.

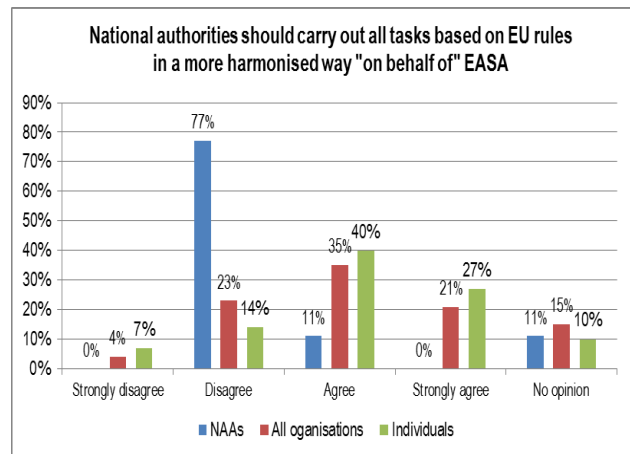
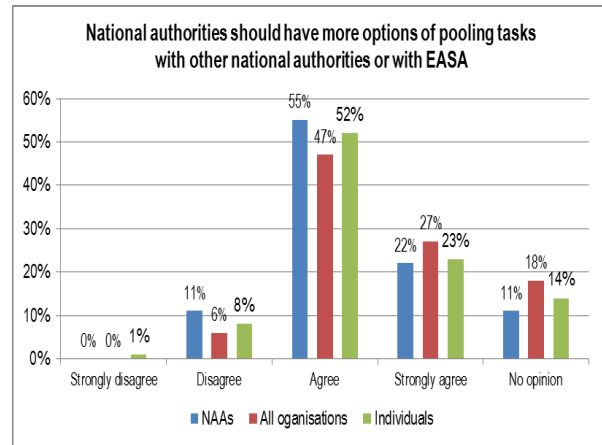
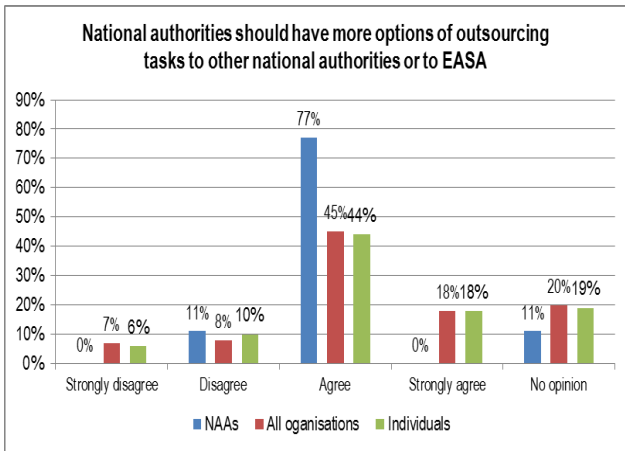


Views are split on whether some of the responsibilities should be moved from the European Commission to EASA. On the other hand respondents are clearly against moving responsibilities from EASA back to the European Commission.



There is a clear agreement between all the categories of respondents that national authorities should have more options of outsourcing and pooling tasks amongst each other and with EASA.

The majority of the organisations (58%) would like to see the safety oversight and certification tasks executed by national authorities on behalf of EASA in a more harmonised manner. The majority of the respondent NAAs oppose to such a proposition.

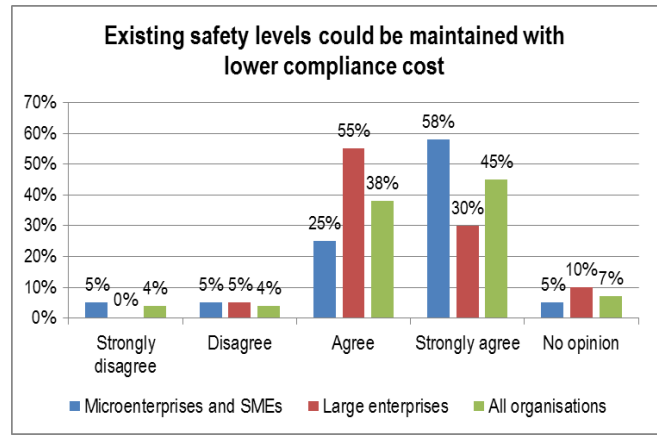
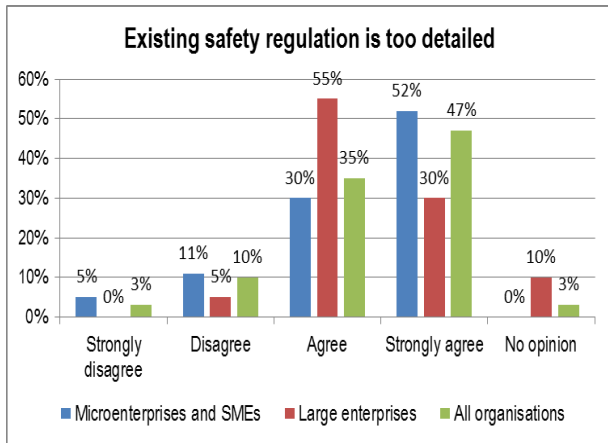


f. Small and Medium Sized Enterprises (SMEs)

The on-line survey contained a section dedicated to SMEs, and a number of contributors commented on this issue. The organisations which explicitly commented on the impact of the present regulatory system on SMEs highlighted the following:

- ⇒ The present regulatory system puts excessive requirements on SMEs compared to achieved safety benefits. In particular it is felt by many contributors that regulations are too complex and beyond the ability of many SMEs to comprehend and be abreast with the constant changes;
- ⇒ The regulations do not sufficiently differentiate between commercial air transportation provided on the mass scale by airlines and commercial air transportation provided by SMEs;
- ⇒ The present improvements are focused on non-commercial aviation (i.e. general aviation), and not sufficient attention is being given to more proportionate regulation for commercial activities of SMEs;
- ⇒ Regulations are very difficult to implement by companies where a single individual performs roles which in an airline or a big manufacturer are responsibility of multiple departments;

Overall, there is almost unanimity amongst the micro and SME enterprises which responded to the questionnaire, that the existing safety regulation is too detailed and that the existing safety levels could be maintained with lower compliance cost.



g. Other issues

Amongst some other issues brought by the respondents to the attention of the Commission were:

- ⇒ Suggestion to create a Light Sport Aircraft category, similar to the US one;
- ⇒ Need for translation of 'soft law' material into national languages;
- ⇒ Greater reliance on standards developed by the industry through recognised standardisation bodies;
- ⇒ Need for development of manuals which regroup all the regulatory material for a particular domain (i.e. general aviation) in a single user-friendly document;
- ⇒ Need for development of EU standards and authorisation procedures for aviation bio-fuels;
- ⇒ Review of EU requirements concerning wet-leasing to make them more operational;