

Regulation EC 785/2004 Insurance Requirements

Q1 : We do not believe that there has been any significant impact on commercial air carriers as they were (generally) already buying in excess of the regulation requirements.

Q2 : The vast majority of GA operators, whether private or commercial, previously bought limits above the minimum imposed by the regulation. Our experience shows that it is only the former eastern block countries which have become member states where there has been a noticeable increase in limits bought.

Q3 : The insurance market provides reasonable cover for Historic aircraft however a general lack of appetite amongst underwriters for this class of business may be forcing premiums higher than expected.

Q4 : In our opinion yes the requirement still exists. Some would argue that non-commercial operators are more of a target than commercial operators due to being a softer target.

Q5 : We think that a standard SDR limit for all aircraft whether commercial or non commercial makes more sense. The type of aircraft which crashes, or its operational status, is not directly linked to the passengers wealth or possible liability award. A standard approach will help with clarity to all aircraft owners/operators.

Q6 : To our knowledge operators would always provide a insurance certificate as evidence of coverage. A full copy of the Policy would be a valid but unlikely alternative.

Q7 : A universal certificate would be of benefit creating clarity and eliminating any confusion.

Q8 : Not applicable to our portfolio

Q9 : Not to our knowledge.

Q10 : Although no need exists, harmonisation would provide more clarity and greatly reduce dispute costs post an event.

Q11 : In our opinion yes it is still required.

Q12 : We would not wish to include such cover, especially, as noted in the discussion document as the market premium levels are low. If it is financial guarantee then it might be a problem for some markets.

Q13 : Might this be catered for by first party travel insurance?

Q14 : Not significantly.

Q15 : We believe that it is still necessary to have harmonised insurance requirements for both commercial and non commercial operators. The impact of exempting non commercial operators is insufficient limits being bought which will result in law suits against the aircraft owners or their estates.