

EUROPEAN COMMISSION
Directorate General Energy and Transport
Internal Market, Aviation Agreements & Multilateral Relations
DM 24 5/118
B-1049 – Brussels

Subject – Discussion paper of Regulation 785/2004 on insurance requirements for air carrier and aircraft operators.

With reference to your letter TREN F1/mn/LG D(2007) 321545 dated 17 September last, please find hereinafter the answer by point to the questionnaire referred in the subject.

Q1: As far as we know, the Regulation didn't had any impact on the insurance policy of air carriers. Insurance certification adopted by Italy shows the compliance with the minimum requirements only but we are aware that same air carriers carry insurances above that minimum.

Q2: The economic impact on general aviation has not yet been studied and therefore data on this item are not available.

Q3: We do not have any evidence of historic aircraft instances but we do not have objection to regulate this matter.

Q4: No

Q5: Specific rules for aircraft while the aircraft is still at the airport could lead to a higher control but what about the related costs?

Q6: Air carriers licensed in third countries and aircraft operators using aircraft registered outside the EU provide an insurance simplified form drafted by ENAC.

Q7: A common EU insurance simplified form is highly desirable.

Q11 (8): Italy didn't set a lower minimum insurance level foreseen in art.6(1).



Q12 (9): No

Q14 (10): Not at the moment.

Q15 (11): The modernized Rome Convention will assure a level playing field with the third country air carriers.

Q16 and Q17 (12/13): The modernized Rome Convention is facing the matter.

Q18 and Q19 (14/15): We make references the above considerations.

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