

**CAA CONSULTATION ON DELEGATED AIRWORTHINESS ORGANISATION APPROVALS.
WHY YOU NEED TO RESPOND.**

On 1st April 2021, the CAA launched a stakeholder consultation on proposed changes to British Civil Airworthiness Requirements, known as BCAR or CAP 553, and two segments which apply to the LAA and BMAA - *Chapter A3-7: Permit to Fly Aircraft – Initial and Continuing Airworthiness and Chapter A8-26: Approval of Organisations Supporting Recreational Aviation*. This is the mechanism by which the CAA delegates the oversight privileges to an approved organisation such as the LAA.

The LAA has serious reservations about many of the changes proposed, which includes the introduction of large swathes of regulation from the certified world which significantly increase bureaucracy and the cost of providing an airworthiness service with no commensurate improvement in the safety of our activities. If these changes are passed, the costs of the additional administration and bureaucracy will inevitably have to be passed on through higher fees to LAA members.

The CAA in their consultation document <https://bit.ly/3wcvXsj>, asks that responses name specific paragraph references and suggested changes or comments. At a meeting with the head of the GA and RPAS Unit at the end of April it was agreed that the narrow terms of the consultation were an opportunity lost, and therefore wider responses covering the whole of A3-7 and A8-26, not just the immediate revisions, would be accepted. We are preparing a detailed line by line response to the consultation, but we encourage you to respond with the core message above.

We have until 27 May 2021 to send comments to the CAA by email to ga@caa.co.uk. We would therefore urge you as members and stakeholders, to respond to the public consultation by asking the CAA to withdraw these proposals. Please note, it will be your only chance to do so.

We believe the CAA should temporarily withdraw these proposals and only resubmit them after a collaborative working group has been convened and a proper consensus with both BMAA and LAA achieved.

In addition, much of A3-7 is inapplicable to recreational aviation when controlled by the sporting organisations and we recommend that A8-26 is decoupled from A3-7, with only agreed and relevant clauses from A3-7 incorporated in A8-26.

I hope you will assist us by taking a moment to respond.

Many thanks

Steve Slater
CEO