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Response to

Consultation on impact assessment of derogations from regulation 300/2008, on the baseline standards for aviation security in the European Union (DFT-2009-57)

The Light Aircraft Association (LAA) is the leading organisation for powered Sports and Recreational Aviation (S&RA) in the UK. It has 8,000 members and regulates approximately 2,500 light aircraft, under delegated authority from the Civil Aviation Authority (CAA). Our aircraft are usually flown by their owners, they are not permitted to do aerial work, or carry paying passengers. The vast majority have no more than two seats.

The LAA is greatly concerned that the Regulation (EC) 300/2008 will impose major unnecessary burdens on the General Aviation (GA) industry, and particularly on S&RA, while not adding to aviation security. The risk from terrorism posed by small light aircraft is trivial, compared with the risk presented by commercial airliners, as has been proven over many years. Unlike larger aircraft, S&RA aircraft do not have the potential to cause great damage. Hence the imposition of baseline security standards (Option 1) at the airstrips and aerodromes we use would be grossly disproportionate to the negligible threat, and would add enormously to cost and inconvenience, crippling the UK GA industry and especially S&RA.

LAA supports Option 3 of the proposals, which we believe is a sensible level of derogation from the baseline standards. LAA does not favour (although we do strongly oppose) Option 4, but we reject Option 2 as damaging to the entire GA industry, by its exclusion of helicopters and aerial work.

Beyond the permitted option choices, however, there are some important issues which will be vital to effective and proportionate security regulation. There were some significant defects with the DfT consultation process which have not allowed these issues to be fully explored or provided for consultation.

The LAA considers that smaller aerodromes, airfields and airstrips used by our members *should not have alternative security measures imposed under this regulation*. To achieve this goal, we believe that:

- 1) All of these facilities should be presumed to be derogated from the requirements of the Regulation (EC) 300/2008 and
- 2) No individual local risk assessment should be required for these fields, because the applicable alternative security measures proposed should be presumed to be nil, unless special circumstances can be shown to apply to a particular facility.

We consider that the cut-off point, below which no local risk assessment will be required and alternative security measures will be presumed to be nil, is those aerodromes which only permit the landing and take-off of aircraft below 15,000kg Maximum Take-off Weight (MTOW).

Many of our members use larger GA aerodromes which may fall outside the derogation suggested above, and hence will require some level of alternative security measures. Many also use regional airports serving Commercial Air Transport (CAT), where demarcated areas should be provided such that GA traffic is not required to comply with baseline security standards which apply to CAT. In both these cases, we believe that the principles of effective demarcation and a proportionate light touch should be used to clearly separate the security requirements necessary for CAT from those appropriate to light traffic. We are also concerned that proper consideration should be given to airfields owned by the military, from which numerous light aircraft operate.

In all these cases, effective local risk assessments provide the means for ensuring that GA and especially S&RA will not be crippled by wholly inappropriate security measures. The LAA as a responsible stakeholder will be happy to work with the DfT to help establish best practice in security regulation of smaller aerodromes.

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