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Report on the Permit and License Simplification and Harmonization in the Civil Aviation Authority¹

¹ This legal analysis has been approved in the 254th Meeting of the Government of the Republic of Kosovo, with the decision No. 04/254 dated 26.03.2025.

CAA - Civil Aviation Authority

EASA - European Aviation Safety Agency.

EU - European Union

GIZ - Gesellschaft für Internationale Zusammenarbeit

ECAA - European Common Aviation Area

LCA - Law No. 03/L-051 on Civil Aviation

LGAP - Law No. 05/L-031 on General Administrative Procedure

LPLS - Law No. 04/L-202 on Permit and License System

ICAO - International Civil Aviation Organization

SPC - Single Points of Contact

CRPL - Central Registry of Permits and Licenses

OPM - Office of the Prime Minister

LO - Legal Office

1. Introduction

This report, supported by GIZ project, aims to reflect the findings and general and specific recommendations for simplifying the procedures for application, review and issuance of permits and licenses in CAA, as well as to harmonize CAA's permits and licenses with the LPLS. The permit and license simplification under this reports aims to be achieved through several principles and requirements which are defined in LPLS as well as in LGAP. On the other hand, harmonization means the suitability of LCA with LPLS in terms of issuing the respective permits and licenses, which are issued by CAA. Throughout the fulfillment of the goal of this report, the specificities of CAA's work as well as the specifics of the civil aviation sector will be taken into consideration, whether in terms of air operations safety or even in terms of EU directives, which have a particular status and importance for mandatory application in CAA, to be clarified below.

In the context of this report, a methodology has been followed, resulting with the following recommendations: **1. General recommendations** and **2. Specific recommendations**. Special recommendations are set out in the annex to this report and are provided for each permit or license, specifically according to the findings.

Additionally, besides the recommendations in the report, the main and specific findings have been described, aligning with the report's purpose to simplify and harmonize permits and licenses.

The permit and license simplification and harmonization in CAA, according to this report, particularly takes into account:

1. Facilitation of the application procedure for permits and licenses;
2. Reduction of administrative burden on the applicant during application;
3. Facilitation of the request review process and evidence verification;
4. Addressing the licensee's safety issue, in terms of extending the term, based on the specific criteria of licenses or permits, depending on the level of risk;
5. Ensuring the legality of licenses and the specific legal basis, ensuring they are in accordance with the law, as designated by financial institution permits issued by, based on the Central Registry of Permits and Licenses;
6. Addressing the harmonization and compatibility of LPLS requirements with the adjustments defined in LCAA and relevant bylaws applied by CAA.

To compile this report, several sources have been reviewed, as follows: LPLS; LGAP; LCA; Law on Amending and Supplementing the LCA; bylaws that are applied by CAA; CRLP; Meetings and data received from CAA, according to the table. CAA has not commented on the reports. Furthermore, in this regard, the clarifying meeting with CAA officials on 30.08.2024 should also be mentioned.

For the purposes of this report, the terminology of the designation "permits and licenses" under the LPLS has been used, which includes the application of other types of permits issued by CAA and are not named as permits and licenses.

2. Legal analysis regarding the permit and license simplification in CAA

In this section, the analysis of the main legislation regulating permissions (permits and licenses) in CAA is presented. The Law on Permit and License System (hereinafter LPLS) is a horizontal law which, in Article 1, regulates the principles and rules for improving the business environment by reducing administrative barriers in carrying out economic, commercial or professional activities necessary to protect public health, public safety, the environment, and the use of natural resources in the Republic of Kosovo. Another horizontal law generally governing the exercise of public authority, which most frequently applies to permissions, is the Law on General Administrative Procedure (LGAP), the purpose of which is to ensure the effective exercise of public authority with a view to the public interest, guaranteeing at the same time under Article 1 the protection of the rights and legal interests of persons. Nonetheless, the compatibility of LCA and LPLS should be carefully assessed, especially the implementation of LPLS in the case of CAA due to flight safety concerns.

Moreover, we will analyze some of the key principles and rules provided in these laws and rules as well as the specific criteria outlined in LCA and other relevant bylaws. Achieving the goal of simplification of permits and licenses issued by the CAA requires an analysis of the LCA and the law on amending and supplementing the LCA. The analysis of LCA and LPLS in terms of harmonization is based on the factual situation, which implies considering all permits and licenses (permissions) issued by CAA, based on CRLP as well as the data provided by CAA, according to the table and other data resulting from the meetings.

In terms of designation, LPLS in Article 1 (1.3) uses the term “*Licensee - a natural person to whom a professional license has been issued*”. On the other hand, the LCA does not specifically refer to the cases when the permits and licenses issued by them are dedicated to natural or legal persons (different operators). In certain cases, according to the definition of the law, such as for example Article 37 of the LCA, it is implied that the license is issued to aviation personnel. However, pursuant to LPLS, namely Article 1, as it was pointed out “the licensee” means a natural person, while the permit means the designated authority (Article 1 para 1.8 of LPLS), which can be a legal person, applying to obtain a permit.

These issues are regulated by the secondary legislation of CAA. These are the examples and definitions outlined in Regulation (CAA) no. 05/2020 and Regulation (CAA) no. 01/2022: 'aircraft operator' denotes any legal or natural person that operates or proposes to operate one or more aircraft; 'aerodrome operator' denotes any legal or natural person that operates or proposes to operate one or more aerodromes; 'certification' signifies any form of acknowledgment in accordance with this regulation, based on a proper assessment, that a legal or natural person, product, part, non-installed equipment, remotely piloted aircraft system equipment, aerodrome, aerodrome security-related equipment, ATC/ANS system, ATC/ANS components, or flight simulation training device meets the relevant requirements of this regulation and the delegated and implementing acts endorsed on its basis, by issuing a certificate validating such conformity; and also 'ATC/ANS Service Provider' refers to any legal or natural person offering any of the ATC/ANS services as defined in Article 3(5) of Regulation 05/2020 of the CAA, either individually or collectively for air traffic in general. Similarly, there is a deficiency of LPLS in this aspect.

Whereas LPLS, in Article 5 has defined the types of permits, such as: *notification, registration, permit and professional license*. On the other hand, based on the factual situation and the licenses evidenced in CRLP as well as the data received by CAA, this authority issues the categories of permissions (permits and licenses) as follows: **Approvals; Authorizations; Certificates; Certifications; Permits; Licenses; Amendments to Certificates; Endorsements; Renewal of Certificates; Decisions for Approvals**. However, as will be seen below, in the general and specific recommendations, some permits (permit and licenses) of CAA, do not have a specific legal basis and do not refer at all to the Law on CAA. Based on the concept of harmonization, in accordance with LPLS, this is required to be done by law. For all CAA cases, international standards must be taken into account, and the possibility of license grouping should be examined, as stipulated in Article 5 of the CAA Law, solely based on the risk level.

Within the system of permits and licenses issued by CAA, based on LCA, the issue of simplifying permits and licenses in this sector will be examined based on several principles recognized by LPLS and LGAP. These principles will serve to provide general and specific recommendations, in order to simplify permits and licenses issued by CAA. Principles are as follows:

License duration period. The LCA does not decisively determine the validity period of a permit or license issued by CAA. However, it is important that, in relation to the principle of efficiency, according to Article 10 of LGAP, CAA takes into account the establishment of rules that define the deadline for each permission (permit and license) it issues. Furthermore, the extension may be related to the level of risk, security, public health protection, type of activity, and other important aspects that may vary depending on the specific permit or license. Therefore, clear legal criteria should be established for the issue of duration. The deadline for permits and licenses issued by CAA needs to be standardized and determined. When interpreting the clarifications provided by the CAA, while taking into account the EU directives, it is preferable that in cases where the relevant directives do not specify a deadline, the license should remain indefinite; in other cases, the deadline of the directive should be valid for the respective license.

The principle of non-discrimination. This principle is determined in Article 6 of LGAP and as such should also be applied by CAA, concerning the issuance of licenses and other permits it grants. Especially, this principle should be strictly determined when it comes to the extension of the license, which CAA evaluates and decides upon, based on the discretion criteria, relying on the minimum and maximum duration and taking into account in some cases that the duration is not even defined in the CAA bylaws. Furthermore, the same should become part of the procedures for issuing permits and licenses within the CAA, in order to simplify permits and licenses.

The right to appeal. This constitutes a constitutional obligation. The license review system in CAA as well as the procedures thereof, do not provide for the right of appeal in case of rejection. Article 27, paragraph 2 of LCA to the right of appeal based on the LGAP. LGAP also in Article 125 defines the appeal as a tool for the realization of a certain right. This is also defined in Article 27 of LPLS. This means that in the administrative procedure for reviewing the CAA permits and licenses, a concrete appeals mechanism must be defined, to examine the eventual rejection of the respective permit and license issued by the CAA. CAA should establish an internal appeals commission, which addresses the rejection in relation to the rejection of complaints. In this regard, in the recommendations, based also on the LCA, it should be recommended an effective legal remedy, only for the procedure of permits and licenses in the CAA.

Payment of fees. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. On the other hand, LGAP determines the non-payment of the procedure, and according to this, this fee payment can only be made in cases where it is otherwise determined by law. The Law on CAA does not define at all the issue of payment of fees for permits and licenses issued by CAA. Based on LPLS and LGAP, CAA is obliged to calculate these fees, especially those of the application, in proportion to administrative expenses. According to the CAA data, the license review fees are paid at the time of application review. However, in order to ease the issue of the activity of the licensees and also the licensees, CAA applies the payment procedures through E-Banking. The fees issued by the CAA are specifically defined in Regulation (CAA) no. 2/2015 on Fees Charged by the Civil Aviation Authority of Kosovo, as amended.

The principle of one stop shop (Single Points of Contact) is a legal obligation defined both in LPLS, respectively Article 16, as well as in LGAP, Article 33. According to this principle, all formalities and procedures for issuing a permit and license must be carried out through SPCs (one stop shop). Both laws provide for SPCs to be established physically, electronically or combined. The main prerequisite for establishing SPCs are the points we mentioned above, especially the approach oriented towards the principle of administrative review ex officio. Within CAA, there is no type of SPC, as allocated by each

public body, meaning that the party itself performs all the formalities and procedures that, if an SPC was in place, could be carried out through it by the public body itself.

The principle of applying administrative assistance. Article 34 of LGAP stipulates: that a public authority may request assistance from another public authority, among other things, to become acquainted with facts, documents, or other means of evidence in the possession of the other authority. This principle can be used to simplify the verification procedure of necessary documents. In the case of reviewing the procedures for licenses and permits, CAA does not apply the principle of legal assistance at all. According to this principle, CAA must verify a number of documents, according to the principle of assistance, in cooperation with other competent bodies to help the party to reduce the administrative burden.

Consideration of conducting the procedure ex officio. This principle is allowed by Article 86 of LGAP. In fact, this principle, in light of simplifying the procedures for issuing licenses at CAA, should be combined with the principle of applying administrative assistance, based on how the licensing procedure is regulated at CAA. CAA does not apply at all the principle of conducting the procedure ex officio. Moreover, in line with this, CAA has no concrete regulation that deals with the procedure of granting permits and licenses which are evidenced in CRLP and which are issued by the CAA based on the data provided. Article 86.3 of LGAP, regarding this principle, stipulates: ***“Except when otherwise provided by law, documents that prove acts, facts, quality or subjective state, necessary for the administrative examination, are administered, ex-officio, by the public body that conducts the administrative procedure, if they are under its administration or other public bodies. The public body can only ask the party for the necessary information for their identification”***. This implies that in some cases, when the documents and conditions of documentation for a license are not determined by law, then CAA in the specific case may request the party to only demonstrate that some documents exist and to verify them if they exist in public bodies. Some documents according to the recommendation in the annex, in the case of CAA, should be checked according to the principle of ex officio action, in order to reduce the administrative burden on the party. According to the clarifications in the annex, the documents defined for licenses also define documents issued by CAA itself, such as the certificate of origin. These documents should be eliminated.

The right to provide opinions, explanations and evidence: Article 94 of LGAP allows the party to provide evidence and clarify issues during the review and conduct of the procedure until the final decision is made. In the case of CAA, there is no regulation that determines the procedure and provides an opportunity for the party during the application reviews for permit and license to have the right to provide evidence and additional explanations until the decision is made on their application.

Conducting the electronic review procedure. Article 14.2 of LPLS stipulates: ***“Each competent authority shall make it possible for a person to submit an application for a permission electronically”***. This creates the opportunity for CAA to conduct an electronic review procedure based on internal acts issued for licensing. This is possible because Article 17.2 of LPLS allows licensing application procedures to be conducted through bylaws, which in the case of CAA implies that there is no need for legislative amendments regarding the conduct of an electronic procedure. In practice, the CAA, based on the procedures, allows the acceptance of online documentation

Specific conditions and criteria for granting licenses. In the case of CAA, the documents required for a license are quite specific because they are also related to: public health and safety; security and above all conditioned by international civil aviation rules. Taking into account the specifics of CAA licenses, then in some cases, even the documentation is specific. Therefore, based on the analysis, the reduction of documentation has been sought on a case-by-case basis, based on two alternatives: 1. Verification of some facts through a statement under oath and 2. Identification by the party of some documents as well as the action of CAA, according to the principle of administrative assistance and conducting the procedure ex officio.

Submission of original documentation - In the context of permits approved by ICMM, there is a phenomenon based on the Central Registry of Permits and Licenses (CRPL), and this phenomenon concerns the submission of some documents in original, including those documents that constitute notary and even undisputed facts, such as the business registration certificate or other evidence of the establishment of the association or consortium (depending on the type of permit) or its statute, etc. Therefore, the establishment of this principle has been made with the aim of concreting such a thing in specific recommendations, specified in the annex to this analysis. Per CAA's explanations, copies of documentation are typically needed, while originals may be requested in specific cases, like for instance. Approval of the relevant procedures signed by authorized persons.

3. Legal analysis regarding harmonization

In this report, harmonization implies a process of adapting the LPLS in the specific case and LCA, with the aim of determining the permits and licenses issued by CAA, based on the LPLS. What is important to note about the CAA is the fact that according to the LCA, in the Republic of Kosovo, the International Civil Aviation Conventions are directly applied as well as the elements of the EU *Acquis communautaire*, based on which CAA permits and licenses are issued. In this regard, Articles 3.1 and 3.2 of LCA define ***“3.1 Civil Aviation activities in Kosovo air space shall be carried out in accordance with the provisions of the present law, the Convention on International Civil Aviation of 7 December 1944, and the Agreement on the Establishment of a European Common Aviation Area. 3.3 Any element of the EU’s Acquis communautaire that is referred to or contained in Annex I or II of the Agreement on the Establishment of a European Common Aviation Area shall be directly applicable in Kosovo and shall prevail over any provision or aspect of Kosovo law that is inconsistent therewith”***. As can be seen, these two articles directly apply the rules of international law, including conventions, international agreements, and EU law. **However, it has been confirmed from meetings with CAA that the majority of permits and licenses issued by this agency primarily rely on international law and EU regulations and as such, have arisen from the necessity to be applied according to EU law.** This seems to be one of the main reasons why a large number of permits (licenses) issued by CAA do not have a concrete basis in LCA or any other applicable law approved by the Assembly of the Republic of Kosovo. At the meeting on 30.08.2024, CAA confirmed that the transposition and implementation of EU directives are being carried out in accordance with the established procedures.

Regarding the aspect of harmonization, we can mention some principles as follows:

Definition of permits and licenses by law. This principle is defined in Article 17.1 of LPLS and as such implies that the permit and license, even in terms of designation, is determined by law. In the case of CAA, only some permits and licenses are defined by law. Based on LCA, namely Article 32, the Air Operator Certificate is recognized as a license (permission) issued by CAA for all citizens who wish to engage in air activities (operations) in Kosovo. Similarly, Article 34 of LCA defines the license for the exercise of air transport activities, for which citizens of the Republic of Kosovo (individuals) may apply. Article 35 of LCA acknowledges the issuance of the Air Operator Certificate/License for the exercise of air activities. Article 36 of LCA recognizes licenses and permits for the provision of non-scheduled air services. Article 37 of LCA recognizes licenses for aviation personnel, namely for personnel required to have the corresponding qualification. Article 44 of LCA also acknowledges permits (licenses) issued by CAA, including the airworthiness certificate and the certificate of entry into service, issued for aircrafts registered in Kosovo. Article 46 of LCA recognizes restricted certificates of aircraft type issued in special cases, as well as in Article 47 of LCA, which regulates special cases, namely the issuance of restricted airworthiness certificates dedicated to aircrafts registered in Kosovo. Article 57 of LCA regulates the category of permits issued for Firearms and ammunition, including explosives and harmful or toxic gases, which must be transported on board of the aircraft. These permits are issued under three main conditions

as follows: 1. *only with the written permission of CAA*, (2. *under the supervision of the pilot in command*, and 3. *in full compliance with national and international regulations*. Additionally, Article 61 of LCA also recognizes the airport certificate as a permit (license) issued by CAA, which is issued for individuals undertaking the management (operation) of an airport. In this aspect, a characteristic of permits and licenses in CAA is that a significant portion of them are determined solely through CAA bylaws, contrary to Article 17.1 of LPLS. However, the by-laws and the definition of licenses with these acts are analyzed in the appendix of this report.

Based on Articles 32, 34, 35, 36, 37, 44, 46, 47, 57 and 61 of LCA, the following permits and licenses (authorizations) are recognized

1. The Air Operator Certificate is recognized as a license (permit) issued by CAA for all citizens who wish to engage in air operations in Kosovo.
2. The license for the exercise of air transport activities, for which citizens of the Republic of Kosovo (individuals) may apply.
3. The Air Operator Certificate/License for the exercise of air activities.
4. Licenses and permits for the provision of non-scheduled air services.
5. Licenses for aviation personnel, respectively for personnel required to have the corresponding qualification.
6. Permissions (permits and licenses) issued by CAA, including the airworthiness certificate and the certificate of entry into service, issued for aircrafts registered in Kosovo.
7. Restricted certificates of aircraft type issued in special cases, as well as certificates regulated for special cases, namely the issuance of restricted airworthiness certificates dedicated to aircraft registered in Kosovo.
8. Permits issued by CAA for Firearms and ammunition, including explosives and harmful or toxic gases that shall be transported on board of the aircraft.
9. The airport certificate, as a permission (permit or license) issued by CAA, which is issued for individuals undertaking the management (operation) of an airport.

From the registry of the 79 permits and licenses issued by CAA, LCA only recognizes the above categories of permits and licenses issued for the above-mentioned activities. All permits and licenses that do not fall into the above categories or into the above-mentioned activities recognized by LCA imply that they are not recognized by law, as defined by Article 17 of LPLS. These will be determined in specific recommendations.

Designations of permits and licenses to be determined by law: This requires that all permits and licenses issued by CAA, such as: Approvals; Authorizations; Certificates; Certifications; Permits; Licenses; Amendments to Certificates; Endorsements; Renewal of Certificates; Decisions for Approvals to be determined by law. A certain number of categories of permits and licenses issued by CAA, such as approval and authorizations, as categories are not recognized at all by LCA and do not have a specific legal basis. Moreover, in the course of specific recommendations, specific recommendations have been given for each permit and license, in the sense that if the type of permit and license is determined by law, or the activity for which it is issued, falls into the category of activities specified in the types of permits and licenses elaborated above, according to Articles 32, 34, 35, 36, 37, 44, 46, 47, 57 and 61 of LCA.

Suitability of permits and licenses according to Article 5 of the LPLS: Article 5 of LPLS defines the types of permits, which are: notification, registration, professional permits and licenses. In this case, the designation of the permits made by CAA must also be tailored to this. This means that LCA Articles such as: Articles, 32, 33, 34, 35, 36, 37, 38, 44, 46, 47, 57 which define certain types of permits and licenses will be amended. In this aspect, it is important to name and categorize CAA permits and licenses, based on Article 5 of the LPLS.

Categorizing permits and licenses by risk: LCA should define a system for categorizing permits and licenses by risk, as stipulated in Article 19 of the LPLS. Therefore, an article should be amended or a new article should be introduced in LCA, after Article 31. CAA through the Security Management System determines the level of risk in all areas it regulates. Furthermore, the CAA determines the inclusion of new legislation on the agenda, based on the recommendations and international agreements it implements.

Designate the authority of the board to issue permits and licenses: Law No. 03/L-051 on Civil Aviation and Law No. 08/L-063 on Amending and Supplementing Laws related to Rationalization and Establishment of Accountability Lines of Independent Agencies does not specify which body is competent for issuing permits and licenses. Article 15.1 point “d” of Law No. 08/L-063 on Amending and Supplementing Laws related to Rationalization and Establishment of Accountability Lines of Independent Agencies stipulates that CAA issues licenses, certificates and permits. On the other hand, Article 10 of LPLS specifies as follows: “1. A competent authority shall, for any type of professional licensing that it undertakes, create a licensing board. 2. Such licensing board shall act as an executive body that administers and oversees all areas related to the licensing of professionals in that profession”. So, with the amendment and supplementation of LCA, it must be determined that the board issues respective decisions for the issuance of permits and licenses in CAA. According to the clarification of CAA, based on Article 21 of LCA, the General Director is authorized to issue all permits and licenses, based on the professional recommendations of the relevant units within CAA. This issue is specifically regulated by secondary legislation and by CAA's procedures and processes.

4. Key findings

1. The Law on LPLS “the licensee” refers only to natural persons, while LCA implies that legal entities can also apply for certain permits and licenses. Such a thing has been clarified above and in most cases this is addressed by the sub-legal acts of the CAA.
2. Many permits and licenses are not legally determined;
3. All LCA licenses are for a specified period, according to internal rules (in some cases, the period is not determined by internal rules, according to Article 17 of LPLS), whereas LPLS does not regulate the issue of new licensing or license renewal.
4. A specific appeal procedure for non-licensing is not determined through a mechanism that deals only with licensing issues, but this is done through a general appeals committee.
5. There is no Single Contact Point (SPC - One Stop Shop) in CAA, regarding applications for licenses and other permits.
6. The principle of administrative assistance is not applied to facilitate the verification procedure of the necessary documents submitted for a license, as far as possible in the CAA.
7. The principle of carrying out the procedure according to official duty is not implemented for verifying the documents identified by the parties, which are held by public institutions to the extent possible.
8. Electronic procedures are not defined as a rule but only as an exception.
9. A number of documents required for the category of general requests seem to increase the administrative burden on how they are requested.
10. There is no uniform administrative procedure for the application, review, approval, or rejection of licenses issued by CAA.
11. In some cases, some regulations, especially those before 2017, must also be published in the Albanian language.
12. In some cases, the fee set for a license, according to data provided by CAA, is not determined by regulation.
13. In some cases, the fee does not seem to follow a proportional approach with the necessary administrative expenses for issuing the license, as required by LPLS.

14. The license period is not specified by sub-legal act;
15. There is no harmonization of permits and licenses, based on Article 5 of LPLS;
16. Continuous education programs are missing, according to the requirements of LSLL.

5. General recommendations

1. Regulate more specifically, who can apply for a license and for which licenses (natural or legal person), in all cases.
2. Create a clear legal basis for the existing CAA licenses.
3. Extend the term of granting the license by the CAA, respectively taking into account the principle of the efficiency of the procedure and the risk level of the permit and the license.
4. The Law on CAA should be harmonized, specifically by amending Articles 32, 33, 34, 35, 36, 37, 38, 44, 46, 47, and 57 of LCA, in terms of naming permits by CAA for activities that do not require a license, based on Article 5 of LPLS.
5. The process for addressing complaints regarding non-licensing shall be defined through a mechanism that focuses exclusively on licensing issues.
6. Establish an SPC in CAA.
7. Develop an electronic procedure for application and review of licenses, so that it is not necessary to solely rely on hard copies for application.
8. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions, to the extent possible.
9. Renew licenses according to the ex officio principle, to the extent possible.
10. Verify some necessary documents according to the statement under oath.
11. Payment of initial review fees shall be made after the approval of the application.
12. By relevant regulation, determine the continuous education, according to Article 13 of LPLS.
13. Fees in each case should be set by bylaws.
14. The fee amount should be proportional to the necessary administrative costs during the licensing process.
15. Duration of licenses should be defined by sub-legal acts and without a time limit.
16. The activity of the licenses should be determined by bylaws.
17. The 45-day deadline for permit and license applications, as per the LGAP, shall be enforced, except in cases specified in directives, due to obligations arising from the SAA.

6. Justification of the general recommendations

1. Regulate more specifically, who can apply for a license and for which licenses (natural or legal person). This recommendation is provided because the Law on CAA does not specify the status of the licensee, whether it will be a natural or legal person. On the other hand, LPLS correctly defines in the definitions, for which permits and licenses, natural or legal persons apply. In certain instances, sub legal acts specify this in the CAA, and it must be applicable to all instances.

2. Establish a clear legal basis for existing CAA licenses. Based on Article 17.2 of LPLS, permits and licenses are determined solely by law. In the specific case, in some instances, CAA does not have the 79 permits and licenses it issues legally defined, nor is their activity determined by law. As a result of this, new articles need to be introduced in LCA to enable existing permits and licenses to be legally defined.

3. Extend the term of granting the license by the CAA, taking into account the principle of the efficiency of the procedure and the risk level of the permit if the license or licenses being indefinite.

Considering the principle of efficiency, it should be extended, where possible, for short-term permits and licenses. This should be done considering security, public health protection, and other criteria set by CAA. The minimum term for each license is 5 years. It is advisable to implement it to the fullest extent possible, following applicable directives, and in cases where the directive does not apply, the license is to be issued indefinitely and then monitored through monitoring mechanisms.

4. Cases where a license is not required should be named according to LPLS. Article 5 of LPLS specifies the types of permits. On the other hand, the Law on CAA defines the criteria for permits that do not require a license but still go through an approval procedure. Therefore, this must be done according to the designations defined by Article 5 of the LPLS, such as notification, permit registration, etc. This means that the Law on CAA must be harmonized, namely Article 32,33,34,35,36,37,38,44,46,47,57 of the LAC need to be supplemented, in the sense of naming permits from CAA, for activities that do not require a license, based on Article 5 of the LPLS. Also, according to CAA's clarifications, it is also recommended to categorize permits and licenses issued by CAA, based on Article 5 of the LPLS.

5. Establish an appeal procedure in case of non-licensing. Within the law and regulations applicable the relevant licensing procedures within CAA, a deadline for appeals regarding the rejection of licensing or license renewal has not been defined. To respect the rights of the party, an appeal mechanism must be established in accordance with the principles outlined in the LGAP. Another option of the appeal procedure may be that upon the issuance of the license by the director, the immediate legal remedy is the Competent Court.

6. Establish an SPC in CAA. A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such a measure will also help applicants to efficiently initiate and complete the procedure, and it will also assist the authority in reviewing the application more easily. SPC should also operate in cases of license or permit changes, as well as in appeal procedures during the review process, etc.

7. Develop an electronic procedure for application and review of licenses, so that it is not necessary to solely rely on hard copies for application. The electronic procedure for reviewing permits and licenses greatly simplifies the application and review of licenses and permits at CAA. With the creation of single points of contact, a database or electronic application form can also be created. CAA should apply the possibility that only the documents that are absolutely necessary for verification are sent by the party as in original form or hard copy. The electronic procedure can be determined by the CAA internal rules. Per CAA explanations, applications are accepted electronically.

8. Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions. The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. Through the application of this principle, CAA will verify a number of evidence needed to be submitted by the party when submitting the application. By applying these principles, CAA will avoid the submission of some documents for permits by parties. Part of the documentation needs to be verified by seeking assistance from various administrative bodies.

9. Renewal of licenses should be done ex officio. In the case of license renewal, the verification procedure shall commence and be completed while complying the implementation of procedures ex officio. This principle would also apply to the renewal of the license as well as its modification. CAA is obliged to verify the necessary documents with the relevant competent authorities, and verification should

be done ex officio, without burdening the party with documentation and information that can be obtained from the authorities.

10. Verify some necessary documents according to the statement under oath. Some necessary documents for applying for licenses and permits at CAA are recommended to be reduced to ease the administrative burden. The reduction of these documents can be achieved by verifying some issues that should be part of the application through a statement under oath.

11. Payment of initial review fees shall be made after the approval of the application. Considering the payment of fees and the fact that these fees are calculated based on the principle of calculation in accordance with specific reasonable administrative expenses incurred in the processing of acts to which such taxes refer. To ease the administrative burden, the initial fee should be paid electronically and only after the applicant's request has been approved.

12. To be determined by the relevant regulation for continuous education. According to Article 13 of LPLS. In order to harmonize LCA and LPLS, the issue of continuous education should be regulated by a special regulation, as an obligation for licensees, and this should also be set as a condition in the relevant permits and licenses.

13. Issue a relevant regulation governing the application and review procedures for permits and licenses, according to the principles of LGAP and LPLS. With the aim of regulating a unified procedure that ensures the implementation of the principles of LGAP and LPLS, a regulation should be issued that addresses the processing and review procedure for permits and licenses within CAA, based on the principles of LGAP and the provisions of LPLS.

14. Fees in each case should be set by sub legal acts. In the CAA regulation regarding some fees, the fee related to some licenses is not defined. References for fees in these cases are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for each license should be determined by the CAA bylaws.

15. The amount of the fees must be in proportion to the required administrative expenses throughout the licensing process. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

16. The license term shall be determined by regulation or licenses may be issued without a term. In some cases, the license term was taken from the data provided by the CAA and in the same cases, in the CAA regulations, no provision was found that refers to the duration of these licenses. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted. In no case is the term defined by any legal act, so it should be taken into account that the duration of the licenses should be defined by law or bylaw and that the minimum duration should be 5 years. Similarly, in cases where the license period is not specified by directive, the same (licenses) should be issued without a deadline.

17. The activity of licenses should be determined by sub legal acts. During the research related to this report, in some cases the activity of the respective licenses is not described precisely. Therefore, pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

18. The 45-day decision deadline for permit and license applications should be implemented in accordance with LGAP - in all decision-making instance,CAA applies a decision-making deadline of 90 days for permit and license applications. With the aim of simplifying the procedure and administrative burden, CAA should apply the 45-day deadline for decision-making for permit and license applications, in accordance with the requirements of the LGAP. Applying the 45-day deadline would reduce the time for decision-making and increase efficiency, as well as simplify the administrative burden on the parties involved. This principle should be applied as much as possible, respecting the transposed directives according to the procedures and obligations in the SAA.

7. Implementation of general and specific recommendations

Within the report, as mentioned, general and specific recommendations have been given, presented in the annex for each license. It should be noted that due to the fact that LCA recognizes some categories of permits, according to the explanation above, the specific recommendations in the annex for permits and licenses determined by CAA in some cases have turned out to be the same. Such a situation has arisen due to the fact that a certain number of permits and licenses, with the same name (homogeneous), are issued based on the same legal basis. Additionally, specific recommendations in most cases have resulted in the majority of permits and licenses in CAA not being specifically defined by law.

The implementation of general and specific recommendations, according to the supplement, can be done in two ways: 1. Through amendments and supplementations of LCA, and 2. Through amendments and supplementations of CAA's internal regulations and drafting new regulations.

General and specific recommendations have been provided, based on the analysis of documents, regulations, CAA data, and clarifications received in meetings by the CAA.

ANNEX

The annex includes the permits and licenses issued by CAA

1. APPROVAL OF AERODROMES - CLASS A

1. Legal basis for issuing the permit/license

This license is regulated solely according to Regulation No. 03/2012 on Approved Aerodromes. This Regulation, inter alia, was issued pursuant to Article 61.2. of the LCA which stipulates that *“The CAA shall also establish, in implementing regulations, minimum safety standards for the operation of aerodromes that serve any scheduled or unscheduled passenger operations”*. Thus, this type of license is not defined by the LCA. Furthermore, the “approval” as a type of license is not recognized by the LCA at all.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is licensing related to the operation of Aerodromes, for which operation, CAA must ensure compliance with legal requirements.

1.2 Validity period of the permit/license

Five (5) years.

1.3 Payment for obtaining the permit/license

According to Regulation No. 2/2015 on the Fees Levied by the Civil Aviation Authority of Kosovo and the payment for this approval is 8.000 Euro. Upon application, the applicant must pay 50% of this fee, or 4.000 Euro.

1.4. Documents required for application

1. A copy of the Aerodrome Operations and Maintenance Procedures, prepared in accordance with Regulation 3/2012 on Approved Aerodromes and in accordance with the activities expected at the aerodrome;
2. Details of the physical characteristics of the aerodrome, equipment, services and tools, including aeronautical maps (aerodrome map and barrier map);
3. Original/certified copy of business registration;
4. Evidence of ownership of the aerodrome or the right of use;
5. data (CV) for aerodrome senior management staff: and
6. evidence of payment of 50% of the amount of the fee in accordance with the applicable Regulation on Fees Levied by the CAA.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;

3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied regarding “original/certified copy of business registration and “evidence of aerodrome ownership or the right of use”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 8.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Moreover, it should be stipulated that the entire fee payment is made only after the license is issued and not at the time of application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA in implementing the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

2. APPROVAL OF AERODROMES - CLASS B

1. Legal basis for issuing the permit/license:

This license is regulated solely according to Regulation No. 03/2012 on Approved Aerodromes. This Regulation, inter alia, was issued pursuant to Article 61.2. of the LCA which stipulates that *“The CAA shall also establish, in implementing regulations, minimum safety standards for the operation of aerodromes that serve any scheduled or unscheduled passenger operations”*. Thus, this type of license is not defined by the LCA. Furthermore, the “approval” as a type of license is not recognized by the LCA at all.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is licensing related to the operation of Aerodromes, for which operation, CAA must ensure compliance with legal requirements.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

According to Regulation No. 2/2015 on the Fees Levied by the Civil Aviation Authority of Kosovo and the payment for this approval is 4.000 Euro. Upon application, the applicant must pay 50% of this fee, or 2.000 Euro.

1.4. Documents required for application

1. A copy of the Aerodrome Operations and Maintenance Procedures, prepared in accordance with Regulation 3/2012 on Approved Aerodromes and in accordance with the activities expected at the aerodrome;
2. Details of the physical characteristics of the aerodrome, equipment, services and tools, including aeronautical maps (aerodrome map and barrier map);
3. Original/certified copy of business registration;
4. Evidence of ownership of the aerodrome or the right of use;
5. Data (CV) for aerodrome senior management staff; and
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable Regulation on Fees Levied by the CAA.

2. Recommendations

1. This license must be determined by law.
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.
3. The renewal of licenses should be done according to the ex officio principle.
4. Review the application fee.
5. Establish an SPC in CAA.
6. Draft a special regulation on the procedure and criteria for issuing approvals

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS, respectively Article 17.1.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied regarding “original/certified copy of business registration and “evidence of aerodrome ownership or the right of use”. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application. Through these principles, the CAA would certify the documents concerned through a statement under oath or verification with the help of other competent bodies.
3. **Renewal of licenses should be done ex officio.** To reduce the applicant’s administrative burden, the renewal of this license should be done ex-officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 4.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Moreover, it should be stipulated that the entire fee payment is made only after the license is issued and not at the time of application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

3. APPROVAL OF TRAINING ORGANIZATIONS MANUALS

1. Legal basis for issuing the permit/license.

The basis of this approval is Article 62 of the Law on CAA, which stipulates that “Each aerodrome operator shall prepare, issue and maintain an “aerodrome services and operations manual”. The aerodrome operator shall submit such manual to the CAA, which shall review such manual. The CAA shall have the authority to require any changes in such manual that the CAA reasonably determines to be necessary or advisable. The manual shall, inter alia, indicate the organization of the aerodrome and specify the take-off and landing procedures and rules concerning the use of the aerodrome. The CAA shall

publish the manual in aeronautical information publications”. Although the legal basis for this license exists, it either needs to be renamed in LCA through an amendment to Article 62 or the name of the license should be adapted to Article 62 of LCA, so that the legal basis for this license is specific.

1.1. The activity for which the permit/license is issued

This license aims to confirm that the manual drafted by the respective aerodrome is adequate to meet the relevant requirements.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff;
4. Air operation certificate;
5. Specification of operations;

2. Recommendations

1. Regulate the legal basis of this license and harmonize it with Article 62 or supplement Article 62 of LCA in accordance with LPLS;
2. Define by regulation precise and objective criteria for determining the deadline;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Determine the fee for application by law or regulation;
5. Establish an SPC in CAA;

3. Justification of recommendations

1. **Regulate the legal basis of this license.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS, respectively Article 5. However, not delving into the professional content of the issues handled by CAA, it seems that the approval of manuals aims more to confirm that the content drafted by the aerodrome operator is adequate. Thus, the content of Article 62 of LCA does not precisely align with the definition of licenses in LPLS. This issue needs therefore to be addressed if it should be treated as a license or not. If it is deemed that it should be treated as such, then it should be provided for by law accordingly.
2. **Define by regulation precise and objective criteria for determining the deadline.** It is very important that specific rules regarding the deadline are defined for each license. This should even be emphasized in the case where licenses are issued without a specific deadline. In this case, the legal provisions and bylaws do not define any deadline. The deadline in this case is derived from the data provided by CAA. Therefore, it needs to be examined whether there is a need for these

manuals to have a deadline or if this should be addressed in other ways. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, i.e. the “air operation certificate” is issued by CAA itself, so there is no need to request this from the party. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Likewise, some documents of this license, for example the “Organizational structure” must be certified through a statement under oath or by submitting the charter of the legal entity.
4. **Determine the fee for application by regulation.** The CAA regulation on fees, the fee related to manual is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority.

3. APPROVAL OF HELIPORTS

1. Legal basis for issuing the permit/license

This type of license is not defined by law. The basis on which this type of license is issued is Article 4 of Regulation No. 3/2014 on Helicopter Take-Off and Landing Areas Outside an Aerodrome. Paragraph 1 of this Article stipulates that *“To perform operations for the purpose of taking-off and landing of helicopters from NHLS, the helicopter operator must obtain an approval.* The approval is issued by the CAA on the request of the helicopter operator.

1.1. The activity for which the permit/license is issued

Carrying out take-off and landing operations of helicopters.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

1,000 Euro

1.4. Documents required for application

1. Organizational structure of the applicant;

2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations;

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “*air operation certificate*”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
3. **The renewal of licenses should be done according to the ex officio principle.** To ease applicant’s administrative burden, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 1.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would

help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

5. APPROVAL OF MINIMUM OF EQUIPMENT LIST (MEL)

1. Legal basis for issuing the permit/license

The basis of this license is Article 67 of LCA, which stipulates that “Each operator must prepare a “minimum equipment list” for each aircraft it operates. This list must be prepared in accordance with the “basic minimum equipment list” for the type of aircraft concerned. There may be equipment outside the function or with other limitations; however, the list must be approved by CAA, and the aircraft must be operated in accordance with the approved list”. This license is also addressed in Article 9 of Regulation No. 01/2019 Laying Down Technical Requirements and Administrative Procedures Related to Air Operations Pursuant TO CAA Regulation No. 03/2009. The legal basis for this permit and license is not specific, and the law does not recognize the designation as approval, even though it recognizes the category of minimum equipment list under Article 67 of LCAA.

1.1. The activity for which the permit/license is issued

Approval of the minimum equipment list prepared by the operator.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations

1.4. Documents required for application

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Service specifications”

2. Recommendations

1. This license is determined by law in terms of designation;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Determine the fee for application by regulation;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license is determined by law in terms of designation.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. The LCAA does not recognize the term approval pursuant to Article 67, therefore the legal basis of this permit and license must be specified by supplementing Article 67 of LCAA.
2. **Apply the principle of administrative assistance and conducting the procedure ex officio, in terms of the verification of some documents that public institutions possess.** The CAA must apply the principle of administrative assistance during the conduct of the procedure and do this combined with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
3. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

6. APPROVAL OF MAINTENANCE PROGRAMME OF ANY AIRCRAFT (MAINTENANCE PROGRAMMES)

1. **Legal basis for issuing the permit/license**

The general legal basis for issuing this license is Chapter III of LCA. More detailed rules related to this area covered by this license are defined in Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes.

1.1. The activity for which the permit/license is issued

The activity for this license is aircraft maintenance.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations

1.4. Documents required for application

1. A copy of the maintenance program in hard copy and CD/DVD copy;
2. Maintenance schedule - Compliance List Part M on form AIRW-FRM-012b;
3. Maintenance programme checklist on form AIRW-FRM-012c, if applicable,
4. Documentation used to create the maintenance program, e.g. “maintenance manual”, “MPD”, “MRBR”... etc;
5. List of modifications (STC, SB) and repairs performed on the aircraft that affect the aircraft maintenance programme;²

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Determine the fee for application by regulation;
4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. However, the respective license is not defined by law, therefore this requires the amendment and supplementation of LCA to define this license.
2. **The renewal of licenses should be done according to the ex officio principle.** To reduce the applicant’s administrative burden, the renewal of this license should be done ex officio, through a

² Clarification: There is a mismatch between the list of documents required according to the data sent by CAA compared to the list of documents in the corresponding form (See the link <https://caa.rks-gov.net/ep-content/uploads/2018/07/AIW-FRM-012a-Application-for-Approval-of-Aircraft-Maintenance-Programme-1.pdf>). In this case, the list of documents according to the relevant form was taken as a reference.

verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

3. **Determine the fee for application by regulation.** According to the data submitted by CAA, the fee in this case is determined depending on the weight of the aircraft as well as the planned operations. In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Draft a special regulation on the procedure and criteria for issuing approvals:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

7. SPECIAL APPROVALS

1. Legal basis for issuing the permit/license

Regarding this license, there are no provisions in LCA. Under this designation, this license is provided only in Regulation No. 01/2009 on the Reporting of Incidents in Civil Aviation, which regulation has been repealed by Regulation No. 09/2017 on the Reporting, Analysis and Follow-up of Incidents in Civil Aviation.

1.1. The activity for which the permit/license is issued:

Air Operations for Airplane or Helicopter registered in the Republic of Kosovo.

1.2. Validity period of the permit/license:

Five (5) years.

1.3. Payment for obtaining the permit/license:

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Determine the fee for application by regulation;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
3. **The renewal of licenses should be done according to the ex officio principle.** To reduce the applicant’s administrative burden, the renewal of this license must be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing

capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

- 6. Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

8. SPECIAL APPROVALS FOR AREA NAVIGATION OPERATIONS

1. Legal basis for issuing the permit/license

This license is not provided for by law. Provisions related to this issue are included in Regulation No. 5/2013 on Implementation of Annex 15 to the Convention on International Civil Aviation on Aeronautical Information Services. These provisions are in English only. The license is not defined by law, as provided by Article 17.1 of the LPLS.

1.1. The activity for which the permit/license is issued

The activity of this license is related to the Air Operations for Airplanes or Helicopters registered in the Republic of Kosovo.

1.2. Validity period of the permit/license:

Five (5) years.

1.3. Payment for obtaining the permit/license:

Depending on the weight of the aircraft and the planned operations. Unspecified.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations;

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Comply with the principle of official languages;
5. Determine the fee for application by regulation;
6. Establish an SPC in CAA;
7. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law.
2. **Apply the principle of administrative assistance and conducting the procedure ex officio, in terms of the verification of some documents that public institutions possess.** The CAA must apply the principle of administrative assistance during the conduct of the procedure and do this combined with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
3. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Comply with the principle of official languages.** According to Article 5 of the Constitution of the Republic of Kosovo, the official languages in Kosovo are Albanian and Serbian. In the present case, only the general provisions in Regulation No. 5/2013 are in Albanian, while the international standards and recommended practices are only in English. With the aim of complying with the official languages according to the Constitution of the Republic of Kosovo.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
7. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

9. SPECIAL APPROVALS FOR THE TRANSPORTATION OF DANGEROUS GOODS

1. Legal basis for issuing the permit/license

The legal basis for this license is Article 57 of the LCA, which stipulates that “Weapons and ammunitions, including explosives and noxious or toxic gases, shall only be carried on board of an aircraft (i) with the express written permission of the CAA, (ii) under the supervision of the pilot-in command, and (iii) in strict conformity with national and international regulations”. Likewise, Article 8.1. of Regulation No. 04/2020 on the Conditions and Methods of Transporting Dangerous Goods by Air stipulates that “Where specifically provided for in the Technical Instructions, the CAAK may issue approval for the carriage of dangerous goods which is forbidden for carriage by air by passenger and/or cargo aircraft, provided that the level of safety in transport achieved is equal to that provided for in the Technical Instructions”.

1.1. The activity for which the permit/license is issued:

Transportation of goods considered dangerous.

1.2. Validity period of the permit/license:

Five (5) years.

1.3. Payment for obtaining the permit/license:

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

1. Recommendations

1. This license is determined by law in terms of compliance with Article 5 of LPLS;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Determine the fee for application by regulation;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license should be harmonized with LPLS.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws

and the designation should be in line with the LPLS. LCA does not recognize the word “approval” in the context of these permits and licenses, the legal basis of which is not direct or specific.

2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
3. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

10. SPECIAL APPROVALS - MINIMUM REDUCED VERTICAL SEPARATION

1. Legal basis for issuing the permit/license

This form of license is not provided for in CAA. In Regulation No. 01/2019, which defines the technical requirements and administrative procedures regarding air operations based on CAA Regulation No. 03/2009 [Article 5.2.], it is stipulated that “Operators shall comply with the relevant provisions of Annex V when operating: (a) airplanes and helicopters used for: ...(iii). operations in Reduced Vertical Separation Minimum (RVSM) airspace”. The Annex concerned, in English, is part of this Regulation. This license is not defined by law, according to Article 17.1 of LCA.

1.1. The activity for which the permit/license is issued

The activity of this license is operations in Reduced Vertical Separation Minimum airspace.

1.2. Validity period of the permit/license:

Five (5) years.

1.3. Payment for obtaining the permit/license:

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Determine the fee for application by regulation;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. The respective license is not defined by law.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
3. **The renewal of licenses should be done according to the ex officio principle.** To reduce the applicant’s administrative burden, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. regarding fees, no fee is specified for this license. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service

should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

5. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

11. SPECIAL APPROVALS FOR EXTENDED TWIN ENGINE OPERATIONS

1. Legal basis for issuing the permit/license:

This form of license is not provided for by LCA. In Regulation No. 01/2019, which defines the technical and administrative requirements and regarding air operations based on CAA Regulation No. 03/2009 [Article 5.2.], it is stipulated that “Operators shall comply with the relevant provisions of Annex V when operating. (c) two-engined aeroplanes used for extended range operations (ETOPS) in commercial air transport. The Annex concerned, in English, is part of this Regulation. The criterion provided for by law is not met, according to Article 17.1 of LPLS.

1.1. The activity for which the permit/license is issued

The activity of this license is the operation of twin-engine aircraft used for long-distance operations.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Determine the fee for application by regulation;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. The license concerned must therefore be defined by law and LCA must be amended accordingly.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
3. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Determine the fee for application by regulation.** In the CAA regulation on fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would

help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

12. APPROVAL OF THE LEASE CONTRACT (RENTING)

1. Legal basis for issuing the permit/license

This license is not provided for by law. In Regulation No. 01/2019, which defines the technical requirements and administrative procedures regarding air operations based on CAA Regulation No. 03/2009, Annex III, the leasing contract is included only in English. The license is determined by LCA.

1.1. The activity for which the permit/license is issued:

Approval of a lease contract in respect of aircraft used by a certified operator.

1.2. Validity period of the permit/license:

Five (5) years.

1.3. Payment for obtaining the permit/license:

Depending on the weight of the aircraft and the planned operations.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Determine the fee for application by regulation;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. The license has no legal basis, therefore LCA must be amended.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
3. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license

should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

4. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

13. APPROVAL OF MAINTENANCE CONTRACT

1. Legal basis for issuing the permit/license

Chapter III of LCA contains provisions related to maintenance, but not for this type of license. Thus, this type of license is not provided for by LCA. The Regulation No. 08/2018 on the Continuing Airworthiness of Aircraft and Aeronautical Products, Parts and Appliances, and on the Approval of Organisations and Personnel Involved in These Tasks contains provisions related to maintenance but not the approval of the maintenance contract. Provisions related to this approval are part of the annex of the Regulation in question, which is only available in English. This license is not determined by the LCA.

1.1. The activity for which the permit/license is issued

The activity of this license is the approval of maintenance contract.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Determine the fee for application by regulation;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. The license concerned has no legal basis, therefore this can be done by amending the LCA.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
3. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

14. OPERATIONS MANUAL (OM) APPROVAL

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. The CAA Regulation No. 08/2019 Laying Down Detailed Rules for the Operation of Balloons Pursuant to Regulation (CAA) No. 3/2009 in Article 3 contains the provisions related to the operator's obligation to draw up the operation manual.

1.1. The activity for which the permit/license is issued

The activity of this license is the approval of the operations manual.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

According to Article 9.4. of Regulation No. 2/2015 on Fees Levied by the Civil Aviation Authority of Kosovo *"The CAA shall charge and levy a fee for approval of certain parts of the air operator's operations manual (as required by the EU-OPS) at an amount of (€) 300.*

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Establish the appeals procedure in case of non-licensing;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;

5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This license must be defined under LCA, through its supplementation.
2. **Establishing an appeal procedure in case of non-licensing.** Within the law and regulations applicable the relevant licensing procedures within CAA, a deadline for appeals regarding the rejection of licensing or license renewal has not been defined. To respect the rights of the party, an appeal mechanism must be established in accordance with the principles outlined in the LGAP. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA in implementing the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

15. APPROVAL OF TRAINING PROGRAMS FOR THE FLIGHT CREW AND THE CABIN CREW

1. Legal basis for issuing the permit/license

This license is not provided for by law. In various CAA regulations, there are provisions that address issues related to the approval of training programs. Such is Article 12 of Regulation (AAC) No. 07/2020

on Professional Training for the Duties of Importance to the Safety of Aerodrome Operations and Certification of the Professional Training Organizations. Paragraph 5 of this Article specifies that “Any change to the training program must be approved by CAA”. Specific provisions for these types of programs were not found in the data provided by CAA. The license must be defined by law, according to Article 17.1 of LPLS.

1.1. The activity for which the permit/license is issued

The activity of this license is the approval of programs aimed at providing training.

1.2. Validity period of the permit/license:

Five (5) years.

1.3. Payment for obtaining the permit/license:

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff;
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Determine the fee for application by regulation;
6. Establish an SPC in CAA;
7. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This can be achieved through amending and supplementing LCA.
2. **The term of the license should be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
7. **Draft a special regulation on the procedure and criteria for issuing approvals:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

16. APPROVAL OF THE TRAINING PROGRAM FOR DANGEROUS GOODS

1. Legal basis for issuing the permit/license

This license is not determined by law. The rules related to this license are determined by Regulation (AAC) No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air. Article 31.8. of this Regulation stipulates that “Training programs for dangerous goods, established and maintained by the employer, or someone else on his behalf, shall be submitted to the CAAK for approval”. The license lacks a legal basis, and this should therefore be established through amending LCA, based on Article 17.1 of the LPLS.

1.1. The activity for which the permit/license is issued

The activity of this license is the approval of training programs for the transportation of dangerous goods.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

400 Euro.

1.4. Documents required for application

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of staff who are certified for transporting dangerous goods;
4. Air operation certificate;
5. Specification of operations;
6. A copy of the permit issued by the host country.

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This license has no legal basis, therefore it is recommended to amend and supplement the LCA through a new article.
2. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through

a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

17. APPLICANT'S QUALITY SYSTEM (AOC, FTO, AMO) APPROVAL

1. Legal basis for issuing the permit/license

This license is not provided for by law. Regulation No. 7/2012 on Conditions for the Provision of Air Navigation Services, which has now been repealed, contained a specific point for the quality management system [Article 3.2.]. The Regulation (CAA) No. 09/2020 on Laying Down Common Requirements for Providers of Air Traffic Management/Air Navigation Services and Other air Traffic Management Network Functions and Their Oversight, which has repealed the previous regulation, does not contain provisions related to this system. Provisions regarding this system, only available in English, are part of Regulation No. 08/2018 on the Continuing Airworthiness of Aircraft and Aeronautical Products, Parts and Appliances, and on the Approval of Organisations and Personnel Involved in These Tasks. Therefore, the license lacks a legal basis and as such, it is inconsistent with Article 17.1 of the LPLS.

1.1. The activity for which the permit/license is issued

Approval of the quality system, for quality monitoring, including a feedback system for the necessary corrective actions.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Determine the fee for application by regulation;
6. Comply with the principle of official languages;
7. Establish an SPC in CAA;
8. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This recommendation can be implemented by amending and supplementing the LCA.
2. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued

by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

7. **Comply with the principle of official languages.** According to Article 5 of the Constitution of the Republic of Kosovo, the official languages in Kosovo are Albanian and Serbian. In the present case, only the general provisions in Regulation No. 5/2013 are in Albanian, while the international standards and recommended practices are only in English. With the aim of complying with the official languages according to the Constitution of the Republic of Kosovo.
8. **Draft a special regulation on the procedure and criteria for issuing approvals:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA in implementing the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

18. APPROVAL FOR TECH-LOG SYSTEM (AIW)

1. Legal basis for issuing the permit/license

This license is not determined by law. The rules pertaining to this license, available only in English, are outlined in Regulation No. 08/2018 on the Continuing Airworthiness of Aircraft and Aeronautical Products, Parts and Appliances, and on the Approval of Organisations and Personnel Involved in These Tasks. The license is in contradiction with Article 17.1 of LPLS.

1.1. The activity for which the permit/license is issued

The activity of this license is the approval of the technical registry system.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations;

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Determine the fee for application by regulation;
6. Comply with the principle of official languages;
7. Establish an SPC in CAA.
8. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This recommendation can be implemented by supplementing the LCA, to create the concrete legal basis.
2. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Determine the fee for application by regulation.** In the CAA regulation on fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude

the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

7. **Comply with the principle of official languages.** According to Article 5 of the Constitution of the Republic of Kosovo, the official languages in Kosovo are Albanian and Serbian. In the present case, only the general provisions in Regulation No. 5/2013 are in Albanian, while the international standards and recommended practices are only in English. With the aim of complying with the official languages according to the Constitution of the Republic of Kosovo.
8. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

19. INSTALLATION AND EQUIPMENT OR SYSTEM CHANGE APPROVAL

1. Legal basis for issuing the permit/license

This license is not provided for by law. The rules related to this form of license are defined by the CAA Regulations.

1.1. The activity for which the permit/license is issued

The activity of this license is to approve the installation and equipment or change in the system.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Determine the fee for application by regulation;
6. Establish an SPC in CAA;
7. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This license should be defined by law and the recommendation can be implemented by amending the LCA.
2. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Determine the fee for application by regulation.** In the CAA regulation on fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
7. **Draft a special regulation on the procedure and criteria for issuing approvals:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

20. APPROVAL FOR UNMANNED AIRCRAFT SYSTEMS (SAP) FLIGHT OPERATIONS

1. Legal basis for issuing the permit/license

This license is not determined by LCA. The provisions related to this license are defined by Regulation No. 01/2017 Unmanned Aircraft Systems (SAP), amended by Regulation No. 01/2021.

1.1. The activity for which the permit/license is issued

The activity of this license is registration of unmanned aircraft systems (SAP).

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

From 10 to 100 Euro.

1.4. Documents required for application

1. Signed statement;
2. Third party liability insurance policy;
3. A copy of identification document;
4. Flight or user manual;
5. SAP pictures;
6. Description of air operations and flight areas;
7. Knowledge test (for Categories 3 and 4 of SAP);
8. Payment of the SAP registration fee.

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This recommendation can be implemented by amending and supplementing the LCA.
2. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

3. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

21. CERTIFICATION OF AIR NAVIGATION SERVICE PROVIDERS (ANSP)

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. The rules concerning the certification of Air Navigation Service Providers, which primarily authorize the CAA for further regulation through bylaws, are specified in Part 5 of the LCA. Regarding bylaws, the provisions related to this license are defined in Regulation (CAA) No. 09/2020 on Laying Down Common Requirements for Providers of Air Traffic Management/Air Navigation Services and Other air Traffic Management Network Functions and Their Oversight. The license is in contradiction with Article 17.1 of LPLS.

1.1. The activity for which the permit/license is issued

The activity of this license relates to the ANSP operation under certification and provision of air navigation services.

1.2. Validity period of the permit/license

Indefinite.

1.3. Payment for obtaining the permit/license

1. Issuing the certificate 20,000 Euro
2. Change of certificate 500 Euro

1.4. Documents required for application

1. Application for Certification CAAK/ANS/NSA/FRM-04;
2. Questionnaire for meeting the common requirements CAAK/ANS/NSA/FRM-05;
3. Regarding economic regulation: Business plans, 1 and 5 years;
4. Annual report;
5. Audited financial report;

6. Insurance policy;
7. Statements from the risk reinsurance company.

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;
4. Reconsider the fee;
5. Draft a special regulation on the procedure and criteria for issuing approvals;
6. Determine whether natural or legal entities have the right to apply for this license.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. Statutory determination of this license may be made by amending the LCA.
2. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Reconsider the fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. In the present case, the fee of 20,000 Euro for the issuance of this license does not seem to be in accordance with this principle. Also, the revision fee should be waived, in the case of this license.
5. **Draft a special regulation on the procedure and criteria for issuing approvals:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA in implementing the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.
6. **Determine whether natural or legal entities have the right to apply for this license.** It is not specified in the LCA and regulations who can apply for this license. Therefore, it is

imperative to clarify by law which licenses apply to natural persons and which apply to legal persons.

22. APPROVAL OF CHANGES IN FUNCTIONAL SYSTEMS

1. Legal basis for issuing the permit/license

This license is not determined by the LCA. The provisions related to this license are defined and Regulation (CAA) No. 09/2020 on Laying Down Common Requirements for Providers of Air Traffic Management/Air Navigation Services and Other air Traffic Management Network Functions and Their Oversight.

1.1.The activity for which the permit/license is issued

The activity of this license is the approval of changes in functional systems

1.2.Validity period of the permit/license

Until decommissioning of equipment/systems.

1.3.Payment for obtaining the permit/license

2000 Euro.

1.4.Documents required for application:

N/A (There are no data)

2. Recommendations

1. This license is determined by law;
2. Establish an SPC in CAA;
3. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA.
2. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued

by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

- 3. Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

23. GROUND HANDLING SERVICES CERTIFICATE

1. Legal basis for issuing the permit/license.

This license is not determined by the LCA. The provisions related to this license are defined in Regulation No. 4/2011 on Access to Ground Handling Services Market, and the Regulation 05/2019 on Amending and Supplementing the Regulation 04/2011. The license is in contradiction with LCA.

1.1. The activity for which the permit/license is issued

N/A

1.2. Validity period of the permit/license:

Up to seven (7) years.

1.3. Payment for obtaining the permit/license:

5,000 Euro

1.4. Documents required for application:

1. Business registration certificate issued by the Kosovo authority;
2. Audited annual financial statements for the last two financial years (if applicable);
3. Statement by the auditor on compliance with the requirement arising from Article 4 of Regulation No. 4/2011 as amended of the CAA;
4. The latest quarterly financial reports on business results;
5. Annual business plan for the next three years;
6. Investment report and investment plan for the current year and the next three years;
7. Information on creditworthiness and solvency;
8. Proof of fulfillment of tax liabilities;
9. Valid operation license (if applicable);
10. Risk insurance policy;
11. Company Operations Manual;
12. Other requirements for fuel and oil service providers (sector-specific licenses)
13. Evidence of good reputation;
14. Proof of fee payment (50%).

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In this particular case, this can be applied in relation to the “Business Registration Certificate issued by the Kosovo”, the “Certificate of Fulfillment of Tax Liabilities”, and the “Valid Operation License”. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a

special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said license.

24. MODIFICATION OF AERODROME CERTIFICATE - CLASS A CERTIFICATE

1. Legal basis for issuing the permit/license

Article 62 of LCA stipulates that “Any person who wants to take over the operation (management) of an Aerodrome must apply for an operation certificate from CAA”. However, the LCA does not contain provisions regarding the modification of the Aerodrome Certificate. Therefore, this license is determined by law. The rules concerning the modification of the certificate are defined in Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes. [ADR.AR.C.040 Amendments].

1.1. The activity for which the permit/license is issued

The activity of this license is the reflection of the modifications requested by the operator in infrastructure or operation procedures.

1.2. Validity period of the permit/license

Indefinite.

1.3. Payment for obtaining the permit/license

20.000 Euro.

1.4. Documents required for application

According to the application AACK-AGA-FRM 04: The applicant must submit:

1. A copy of the Aerodrome Operations and Maintenance Procedures, prepared in accordance with Regulation 3/2012 on Approved Aerodromes and in accordance with the activities expected at the aerodrome,
2. Details of the physical characteristics of the aerodrome, equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map),
3. Original/certified copy of business registration,
4. Evidence of ownership of the aerodrome or the right of use,
5. Data (CV) for aerodrome senior management staff; and
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable Regulation on Fees Levied by the CAA.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;

3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing a certificate.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. This recommendation can be implemented by amending and supplementing the LCA.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied regarding the “original/certified copy of business registration” and “evidence of aerodrome ownership or the right of use”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 20.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing a certificate.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said license.

25. MODIFICATION OF AERODROME CERTIFICATE - CLASS B CERTIFICATE

1. Legal basis for issuing the permit/license

Article 62 of LCA stipulates that “Any person who wants to take over the operation (management) of an Aerodrome must apply for an operation certificate from CAA”. However, the LCA does not contain provisions regarding the modification of the Aerodrome Certificate. Therefore, this license is determined by law. The rules concerning the modification of the certificate are defined in Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes. [ADR.AR.C.040 Amendments].

1.1. The activity for which the permit/license is issued

The reflection of the modifications requested by the operator in infrastructure or operation procedures.

1.2. Validity period of the permit/license

N/A

1.3. Payment for obtaining the permit/license

10.000 Euro.

1.4. Documents required for application

According to the application AACK-AGA-FRM 04: The applicant must submit:

1. A copy of the Aerodrome Operations and Maintenance Procedures, prepared in accordance with Regulation 3/2012 on Approved Aerodromes and in accordance with the activities expected at the aerodrome,
2. Details of the physical characteristics of the aerodrome, equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map),
3. Original/certified copy of business registration,
4. Evidence of ownership of the aerodrome or the right of use,
5. Data (CV) for aerodrome senior management staff; and
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable Regulation on Fees Levied by the CAA.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing a certificate.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits,

defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. This is because there are no concrete provisions in the LCA that refer to the modification of this license. The LCA should therefore be supplemented in Article 62.

2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied regarding the “original/certified copy of business registration” and “evidence of aerodrome ownership or the right of use”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 10.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing a certificate.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said license.

26. MODIFICATION OF AERODROME CERTIFICATE - CLASS C CERTIFICATE

1. Legal basis for issuing the permit/license

Article 62 of LCA stipulates that “Any person who wants to take over the operation (management) of an Aerodrome must apply for an operation certificate from CAA”. However, the LCA does not contain provisions regarding the modification of the Aerodrome Certificate. Therefore, this license is determined by law. The rules concerning the modification of the certificate are defined in Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes. [ADR.AR.C.040 Amendments].

1.1. The activity for which the permit/license is issued

The activity of this license is the reflection of the modifications requested by the operator in infrastructure or operation procedures.

1.2. Validity period of the permit/license

Indefinite.

1.3. Payment for obtaining the permit/license

5.000 Euro.

1.4. Documents required for application:

According to the application AACK-AGA-FRM 04: The applicant must submit

1. A copy of the Aerodrome Operations and Maintenance Procedures, prepared in accordance with Regulation 3/2012 on Approved Aerodromes and in accordance with the activities expected at the aerodrome,
2. Details of the physical characteristics of the aerodrome, equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map),
3. Original/certified copy of business registration,
4. Evidence of ownership of the aerodrome or the right of use,
5. Data (CV) for aerodrome senior management staff; and
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable Regulation on Fees Levied by the CAA.

1. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing a certificate.

2. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.

2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied regarding the “original/certified copy of business registration” and “evidence of aerodrome ownership or the right of use”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said license.

27. AIR OPERATOR CERTIFICATE - (AOC-AIR OPERATOR CERTIFICATE)

1. Legal basis for issuing the permit/license

The legal basis for this license is Article 32 of LCA, which stipulates that “Any Citizen of the Republic of Kosovo desiring to engage in air activities (operations) in Kosovo shall obtain and possess a current and valid Air Operator’s Certificate (“AOC”) issued by the CAA”. Also, regarding this license, Article 33 of LCA stipulates that “1. All requirements for an AOC shall be established by the CAA in implementing regulations issued under the authority of this Law”. 2. CAA must ensure that these regulations meet the applicable conditions of ECAA and EASA”.

1.1. The activity for which the permit/license is issued

The activity of this license is the engagement in air activities (operations).

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff;
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;
4. Draft a special regulation on the procedure and criteria for issuing the license.
5. Determine the fee for application by regulation
6. The designation of this license should be harmonized with the LCA
7. The activity of the licenses should be determined by bylaws

3. Justification of recommendations

1. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the license concerned.

5. **Determine the fee for application by regulation.** In the CAA regulation on fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **The designation of this license should be harmonized with the LCA:** Article 5 of LPLS specifies the types of permits. In the specific case, it is about permits, not licenses, but it still goes through the approval procedure. Therefore, this must be done according to the designations defined by Article 5 of LPLS, such as notification, permit registration, etc.
7. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

28. CERTIFICATION OF ORGANIZATIONS FOR THE MAINTENANCE OF AIRCRAFTS

1. Legal basis for issuing the permit/license

This license is not determined by law. The general provisions related to maintenance are outlined in Chapter III of LCA. The provisions pertaining to this license are part of Regulation No. 08/2018 on the Continuing Airworthiness of Aircraft and Aeronautical Products, Parts and Appliances, and on the Approval of Organisations and Personnel Involved in These Tasks (Article 5).

1.1. The activity for which the permit/license is issued

The activity of this license is the certification of organizations for the maintenance of aircrafts.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

500 Euro.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff;
4. Air operation certificate;
5. Specification of operations;

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;

4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing the license.
6. The term of the license should be determined by regulation

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for recognizing this license, therefore this should be addressed through the amendment of Article 48 of the LCA.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.
6. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

29. CERTIFICATION OF ORGANIZATIONS FOR THE MAINTENANCE OF AIRCRAFTS (PART-M SUBPART F)

1. Legal basis for issuing the permit/license

This license is not determined by law. The general provisions related to maintenance are outlined in Chapter III of LCA. The provisions pertaining to this license, some of which are only in English, are part of Regulation No. 08/2018 on the Continuing Airworthiness of Aircraft and Aeronautical Products, Parts and Appliances, and on the Approval of Organisations and Personnel Involved in These Tasks (Article 5 and point 601).

1.1. The activity for which the permit/license is issued

The activity of this license is the certification of organizations for the maintenance of aircrafts.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

500 Euro.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff;
4. Air operation certificate;
5. Specification of operations;

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing the license.
6. Comply with the principle of official languages
7. The term of the license should be determined by regulation

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Chapter III of the LCA.
2. **Regulate more specifically who has the right to apply for this license.** This
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air

Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.

4. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.
7. **Comply with the principle of official languages.** According to Article 5 of the Constitution of the Republic of Kosovo, the official languages in Kosovo are Albanian and Serbian. In some cases, the Regulations approved and published by CAA contain provisions only in English and not in Albanian and Serbian. In order to comply with the official languages according to the Constitution of the Republic of Kosovo, it is necessary that these rules be published in the Albanian language first.
8. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

30. CERTIFICATION OF AIRCRAFT MAINTENANCE TRAINING ORGANIZATIONS

1. Legal basis for issuing the permit/license

This license is not determined by law. The general provisions related to maintenance are outlined in Chapter III of LCA. The provisions pertaining to this license, some of which are only in English, are part of Regulation No. 08/2018 on the Continuing Airworthiness of Aircraft and Aeronautical Products, Parts and Appliances, and on the Approval of Organisations and Personnel Involved in These Tasks (Article 6 and Maintenance Training Organisation Approval referred to in Annex IV (Part-147) EASA Form 11).

1.1. The activity for which the permit/license is issued

The activity of this license is the licensing for aircraft maintenance training organizations.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff;
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing the license.
6. Comply with the principle of official languages
7. The term of the license should be determined by regulation

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment and supplementing of Chapter III of the LCA.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary

documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

6. **Comply with the principle of official languages.** According to Article 5 of the Constitution of the Republic of Kosovo, the official languages in Kosovo are Albanian and Serbian. In some cases, the Regulations approved and published by CAA contain provisions only in English and not in Albanian and Serbian. In order to comply with the official languages according to the Constitution of the Republic of Kosovo, it is necessary that these rules be published in the Albanian language first.
7. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

31. CERTIFICATION OF FLIGHT TRAINING ORGANIZATIONS

1. Legal basis for issuing the permit/license

This license is not determined by law. The provisions related to this license are part of Regulation No. 19/2017 Laying Down Technical Requirements and Administrative Procedures Related to Licenses and Certificates of Air Traffic Controllers.

1.1. The activity for which the permit/license is issued

The activity of this license is the certification of flight training organization.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff;
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;

4. Establish an SPC in CAA;
5. Comply with the principle of official languages
6. Determine the fee for application by regulation
7. The term of the license should be determined by regulation

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. This should be done by supplementing the LCA and introducing a new article.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Comply with the principle of official languages.** According to Article 5 of the Constitution of the Republic of Kosovo, the official languages in Kosovo are Albanian and Serbian. In some cases, the Regulations approved and published by CAA contain provisions only in English and not in Albanian and Serbian. In order to comply with the official languages according to the Constitution of the Republic of Kosovo, it is necessary that these rules be published in the Albanian language first.
6. **Determine the fee for application by regulation.** In the CAA regulation on fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

7. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

32. CERTIFICATION OF CONTINUOUS AIRWORTHINESS MANAGEMENT ORGANIZATION

1. Legal basis for issuing the permit/license

This regulation is not determined by LCA. This license is referred to Regulation (AAC) No. 05/2020 on Common Rules in the Field of Civil Aviation and Establishing a European Union Aviation Safety Agency and Amending Regulation (CAA) No. 10/2015 and Repealing Regulation (CAA) No. 11/2009, Regulation (CAA) No. 03/2009 and Regulation (CAA) No. 6/2009. Accordingly, Article 15.2. of this Regulation defines that “An approval shall also be required in respect of: (a) organisations responsible for the maintenance and continuing airworthiness management of products, parts and noninstalled equipment...”.

1.1. The activity for which the permit/license is issued

The activity for which this license is issued is the certification of the continuous airworthiness management organization.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. The term of the license shall be determined by regulation;
6. The activity of the licenses should be determined by bylaws.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license

needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.

2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
6. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

33. CERTIFICATION OF TRAINING ORGANIZATION FOR HAZARDOUS GOODS

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. Provisions relating to dangerous goods, but not related to training organisations for dangerous goods, are Articles 57-59 of the LCA. The rules related to this license are part of Regulation CAA No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air. Article 30.1. of this Regulation stipulates that “Training in dangerous goods may be conducted by a service provider to whom the CAAK has issued a certificate”.

1.1. The activity for which the permit/license is issued

The activity of this license is the licensing of training organization for dangerous goods.

1.2. Validity period of the permit/license

With indefinite time limit.

1.3. Payment for obtaining the permit/license

500 Euro.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. List of qualifications of staff and instructors;
3. Description of premises (classrooms) for training and other tools;
4. Description of the training program, curriculum, manuals, schedules;

5. Description of the quality control system.

2. Recommendations

1. This license is determined by law;
2. Establish an SPC in CAA;
3. The activity of the licenses should be determined by bylaws.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.
2. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

34. CERTIFICATION FLIGHT SIMULATION TRAINING DEVICES

1. Legal basis for issuing the permit/license

This license is not determined by LCA. The provisions related to this license are part of CAA Regulation No. 05/2022 Amending Regulation (CAA) No. 05/2015 Laying Down Technical Requirements and Administrative Procedures Related to Civil Aviation Aircrew Pursuant to Regulation (CAA) No. 05/2020.

1.1. The activity for which the permit/license is issued

The activity of this license is the certification of flight simulation training devices (FSTD).

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

4.000 Euro.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Establish an SPC in CAA;
5. The activity of the licenses should be determined by bylaws;
6. Review the application fee.
7. The term of the license shall be determined by regulation.
8. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.
2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
6. **Review the application fee:** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. In the specific case, the fee of 4.000 Euro seems not to follow this principle.
7. **The term of the license should be determined by regulation:** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

8. **Draft a special regulation on the procedure and criteria for issuing approvals:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

35. CERTIFICATION OF AVIATION MEDICAL CENTERS

1. Legal basis for issuing the permit/license

This license is not determined by LCA. The provisions related to this license are part of Regulation No. 5/2015 Laying Down Technical Requirements and Administrative Procedures Related to Air Crew of Air Civil Aviation.

1.1. The activity for which the permit/license is issued

The activity of this license is the certification of aviation medical centers.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Establish an SPC in CAA;
5. The activity of the licenses should be determined by bylaws;
6. Determine the fee for application by regulation.
7. The term of the license shall be determined by regulation.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license

needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.

2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
6. **Determine the fee for application by regulation:** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
7. **The term of the license should be determined by regulation:** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

36. LICENSE FOR HELICOPTER TAKE-OFF AND LANDING OUTSIDE AERODROME AREAS

1. Legal basis for issuing the permit/license

This license is not determined by LCA. The provisions related to this license are part of Regulation No. 3/2014 on the Take-Off and Landing of Helicopters Outside Aerodrome Areas.

1.1. The activity for which the permit/license is issued

The activity of this license is the issuance of the permit for the take-off and landing of helicopters outside the aerodrome areas.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Establish an SPC in CAA;
5. The activity of the licenses should be determined by bylaws;
6. Determine the fee for application by regulation.
7. The term of the license shall be determined by regulation.
8. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.
2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued

by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

5. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
6. **Determine the fee for application by regulation:** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
7. **The term of the license should be determined by regulation:** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
8. **Draft a special regulation on the procedure and criteria for issuing the license:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said license.

37. LICENSE FOR AIR TRAFFIC CONTROLLERS

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. A general provision referring to regulation of air navigation services is Article 79 of the LCA, which stipulates that “The regulation of air navigation services shall, where applicable, be based on ICAO, EU/ECAA, EASA and EUROCONTROL rules. The CAA shall issue implementing regulations, based on or consistent with the foregoing, governing the provision of domestic air navigation services”. Regarding this license, the provisions are found in Regulation CAA No. 19/2017 Laying Down Technical Requirements and Administrative Procedures Related to Licenses and Certificates of Air Traffic Controllers.

1.1. The activity for which the permit/license is issued

The activity of this license is the provision of air traffic control services.

1.2. Validity period of the permit/license

Two (2) years.

1.3. Payment for obtaining the permit/license

20 to 100 Euro.

1.4. Documents required for application:

N/A

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;

3. Justification of recommendations

1. **This license is determined by law:** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, introducing a new Article 79.
2. **Renewal of licenses should be done ex officio:** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

38. LICENSE FOR AIRCRAFT MAINTENANCE PERSONNEL

1. Legal basis for issuing the permit/license

The legal basis for issuing this license is Articles 37-39 of LCA. Article 37 of the LCA stipulates that *“Any person acting as an airman shall hold an appropriate license and rating granted or rendered valid by the CAA under the present law and the relevant implementing regulations. Rating refers to an entry on a license stating special conditions, privileges or limitations. The foregoing also applies to air navigation and maintenance personnel as well as flight operations officers, aeronautical station operators and flight instructors”*. The provisions pertaining to this license are likewise part of Regulation AAC No. 08/2018 on the Continuing Airworthiness of Aircraft and Aeronautical Products, Parts and Appliances, and on the Approval of Organisations and Personnel Involved in These Tasks.

1.1. The activity for which the permit/license is issued

The activity of this license is licensing of the aircraft maintenance personnel.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;
4. The activity of the licenses should be determined by bylaws.
5. Determine the fee for application by regulation.

3. Justification of recommendations

1. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an

approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

39. LICENSE FOR GENERAL AVIATION FLIGHT PERSONNEL (DELTAPLANES AND PARAGLIDES)

1. Legal basis for issuing the permit/license

The legal basis for issuing this license is Article 37 of the LCA Plan which stipulates that “Any person acting as an airman shall hold an appropriate license and rating granted or rendered valid by the CAA under the present law and the relevant implementing regulations. Rating refers to an entry on a license stating special conditions, privileges or limitations. The foregoing also applies to air navigation and maintenance personnel as well as flight operations officers, aeronautical station operators and flight instructors”.

1.1. The activity for which the permit/license is issued

The activity of this license is licensing of the general aviation flight personnel.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;
4. The activity of the licenses should be determined by bylaws.
5. Determine the fee for application by regulation

3. Justification of recommendations

1. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air

Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.

2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

40. LICENSE FOR CABIN CREW

1. Legal basis for issuing the permit/license

The legal basis for issuing this license is Article 37 of the LCA Plan which stipulates that “Any person acting as an airman shall hold an appropriate license and rating granted or rendered valid by the CAA under the present law and the relevant implementing regulations. Rating refers to an entry on a license stating special conditions, privileges or limitations. The foregoing also applies to air navigation and maintenance personnel as well as flight operations officers, aeronautical station operators and flight instructors”.

1.1. The activity for which the permit/license is issued

The activity of this license is licensing of the general aviation flight personnel.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;
4. The activity of the licenses should be determined by bylaws.
5. Determine the fee for application by regulation

3. Justification of recommendations

1. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

41. APPROVAL/ENDORSEMENT OF MANAGEMENT PERSONNEL OF THE CERTIFICATE HOLDER FOR AIR OPERATIONS

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. A general provision referring to regulation of air navigation services is Article 79 of the LCA, which stipulates that “The regulation of air navigation services shall, where applicable, be based on ICAO, EU/ECAA, EASA and EUROCONTROL rules. The CAA shall issue implementing regulations, based on or consistent with the foregoing, governing the provision of domestic air navigation services”. Regarding this license, the provisions are found in Regulation CAA No. 19/2017 Laying Down Technical Requirements and Administrative Procedures Related to Licenses and Certificates of Air Traffic Controllers.

1.1. The activity for which the permit/license is issued

The activity of this license is the approval or endorsement of management personnel of the certificate holder for air operations.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Establish an SPC in CAA;
5. The activity of the licenses should be determined by bylaws;
6. Determine the fee for application by regulation.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, introducing a new Article 79 of LCA.
2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative

procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The activity of the licenses should be determined by bylaws.** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
6. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

42. APPROVAL OF DANGEROUS GOODS INSTRUCTORS

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. Provisions relating to dangerous goods, but not related to training organisations for dangerous goods, are Articles 57-59 of the LCA. The rules related to this license are part of Regulation CAA No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air. Article 42.1. of this Regulation stipulates that "Dangerous goods instructor shall be accepted by AACK".

1.1. The activity for which the permit/license is issued

The activity of this license is the approval of dangerous goods instructor.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

50 Euro.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;

3. List of staff who are certified for transporting dangerous goods;
4. Air operation certificate;
5. Specification of operations;
6. A copy of the permit issued by the host country.

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Establish an SPC in CAA;
5. The term of the license shall be determined by regulation;
6. The activity of the licenses should be determined by bylaws;
7. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, introducing a new Article 59 of LCA.
2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

6. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
7. **Draft a special regulation on the procedure and criteria for issuing the license:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval. In the present case, the documents necessary for the application were obtained from the data provided by the CAA and the same are not part of the CAA Regulation no. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air.

43. ELIGIBILITY/APPROVAL OF THE RESPONSIBLE MANAGER OF THE AIR OPERATION CERTIFICATE HOLDER

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. A general provision referring to regulation of air navigation services is Article 79 of the LCA, which stipulates that “The regulation of air navigation services shall, where applicable, be based on ICAO, EU/ECAA, EASA and EUROCONTROL rules. The CAA shall issue implementing regulations, based on or consistent with the foregoing, governing the provision of domestic air navigation services”. Regarding this license, the provisions are found in Regulation CAA No. 19/2017 Laying Down Technical Requirements and Administrative Procedures Related to Licenses and Certificates of Air Traffic Controllers.

1.1. The activity for which the permit/license is issued

The activity of this license is the approval or endorsement of management personnel of the certificate holder for air operations.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Depending on the weight of the aircraft and the planned operations.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;

3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Establish an SPC in CAA;
5. The activity of the licenses should be determined by bylaws;
6. Determine the fee for application by regulation.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, introducing a new Article 79 of LCA.
2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
6. **Determine the fee for application by regulation:** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

44. REGISTRATION OF UNMANNED AIRCRAFT SYSTEMS (SAP)

1. Legal basis for issuing the permit/license

This license is not determined by LCA. The provisions related to this license are defined by Regulation No. 01/2017 Unmanned Aircraft Systems (SAP), amended by Regulation No. 01/2021.

1.1. The activity for which the permit/license is issued

The activity of this license relates to the registration of unmanned aircrafts.

1.2. Validity period of the permit/license

Unspecified.

1.3. Payment for obtaining the permit/license

From 10 to 100 Euro.

1.4. Documents required for application:

1. Signed statement
2. Third party liability insurance policy
3. A copy of identification document
4. Flight or user manual
5. SAP pictures
6. Description of air operations and flight areas
7. Knowledge test (for Categories 3 and 4 of SAP)
8. Payment of the SAP registration fee

2. Recommendations

1. This license is determined by law;
2. Establish an SPC in CAA;
3. Review the application fee.

3. Justification of recommendations

- 1. This license is determined by law:** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.
- 2. Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
- 3. Review the application fee:** It should be stipulated that the entire fee payment is made only after the license is issued and not at the time of application.

45. CERTIFICATION OF HELIPORTS - CLASS A1

1. Legal basis for issuing the permit/license

This license is not regulated by LCA. Specific provisions regarding this license are not even found in the secondary legislation adopted by CAA. Article 1 of the Regulation No. 4/2015 defines the technical requirements and administrative procedures related to air operations stipulating that *“This Regulation lays down detailed rules for air operations with aeroplanes, helicopters, balloons and sailplanes, including ramp inspections of aircraft of operators under the safety oversight of another State when landed at aerodromes located in the territory of the Republic of Kosovo”*. However, this regulation does not contain specific provisions for this license, as its preamble states that it is issued taking into account *“Regulation CAA No. 3/2010 dated 10 October 2010, which applies in the domestic legal order of the Republic of Kosovo the Joint Requirements of Aviation Authorities and Applicable Administrative Procedures in Commercial Air Transport - Helicopters, Joint Aviation Requirements (JAR-OPS3) adopted by the Joint Aviation Authorities (JAA)”*. Under Article 2 of the regulation concerned, Regulation No. 965/2012 with its amendments is declared applicable in the Republic of Kosovo.

1.1. The activity for which the permit/license is issued

The activity of this license relates to the operation of Heliport - Class A1 according to Regulation 17/2017.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

5.000 Euro.

1.4. Documents required for application:

1. A copy of the Aerodrome Operations and Maintenance Procedures, prepared in accordance with Regulation 3/2012 on Approved Aerodromes and in accordance with the activities expected at the aerodrome;
2. Details of the physical characteristics of the; equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map);
3. Original/certified copy of business registration;
4. Evidence of ownership of the aerodrome or the right of use;
5. Data (CV) for aerodrome senior management staff;
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable Regulation on Fees Levied by the CAA.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing the license;
6. The term of the license shall be determined by regulation;

7. The activity of the licenses should be determined by bylaws;
8. Review the application fee.

3. Justification of recommendations

1. **This license is determined by law:** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions:** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to “Original/certified copy of business registration”. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **The renewal of licenses according to the ex officio principle:** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Draft a special regulation on the procedure and criteria for issuing the license:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA in implementing the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.
6. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
7. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
8. **Review the application fee:** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

Moreover, it should be stipulated that the entire fee payment is made only after the license is issued and not at the time of application.

46. CERTIFICATION OF HELIPORTS - CLASS A2

1. Legal basis for issuing the permit/license

This license is not regulated by LCA. Specific provisions regarding this license are not even found in the secondary legislation adopted by CAA. Article 1 of the Regulation No. 4/2015 defines the technical requirements and administrative procedures related to air operations stipulating that “This Regulation lays down detailed rules for air operations with aeroplanes, helicopters, balloons and sailplanes, including ramp inspections of aircraft of operators under the safety oversight of another State when landed at aerodromes located in the territory of the Republic of Kosovo”. However, this regulation does not contain specific provisions for this license, as its preamble states that it is issued taking into account “Regulation CAA No. 3/2010 dated 10 October 2010, which applies in the domestic legal order of the Republic of Kosovo, the Joint Requirements of Aviation Authorities and Applicable Administrative Procedures in Commercial Air Transport - Helicopters, Joint Aviation Requirements (JAR-OPS3) adopted by the Joint Aviation Authorities (JAA)”. Under Article 2 of the regulation concerned, Regulation No. 965/2012 with its amendments is declared applicable in the Republic of Kosovo.

1.1. The activity for which the permit/license is issued

The activity of this license relates to the operation of Heliport - Class A2 according to Regulation 17/2017.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

5.000 Euro.

1.4. Documents required for application:

1. A copy of the Aerodrome Operations and Maintenance Procedures, prepared in accordance with Regulation 3/2012 on Approved Aerodromes and in accordance with the activities expected at the aerodrome;
2. Details of the physical characteristics of the; equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map);
3. Original/certified copy of business registration;
4. Evidence of ownership of the aerodrome or the right of use;
5. Data (CV) for aerodrome senior management staff;
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable Regulation on Fees Levied by the CAA.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;

3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing the license;
6. The term of the license shall be determined by regulation;
7. The activity of the licenses should be determined by bylaws;
8. Review the application fee.

3. Justification of recommendations:

1. **This license is determined by law:** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions:** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to “Original/certified copy of business registration”. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **The renewal of licenses according to the ex officio principle:** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Draft a special regulation on the procedure and criteria for issuing the license:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA in implementing the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.
6. **The term of the license shall be determined by regulation. In the present case, the term was taken from the data provided by CAA:** However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
7. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
8. **Review the application fee:** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit.

In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Moreover, it should be stipulated that the entire fee payment is made only after the license is issued and not at the time of application.

47. CERTIFICATION OF HELIPORTS - CLASS A3

1. Legal basis for issuing the permit/license

This license is not regulated by LCA. Specific provisions regarding this license are not even found in the secondary legislation adopted by CAA. Article 1 of the Regulation No. 4/2015 defines the technical requirements and administrative procedures related to air operations stipulating that “This Regulation lays down detailed rules for air operations with aeroplanes, helicopters, balloons and sailplanes, including ramp inspections of aircraft of operators under the safety oversight of another State when landed at aerodromes located in the territory of the Republic of Kosovo”. However, this regulation does not contain specific provisions for this license, as its preamble states that it is issued taking into account “Regulation CAA No. 3/2010 dated 10 October 2010, which applies in the domestic legal order of the Republic of Kosovo, the Joint Requirements of Aviation Authorities and Applicable Administrative Procedures in Commercial Air Transport - Helicopters, Joint Aviation Requirements (JAR-OPS3) adopted by the Joint Aviation Authorities (JAA)”. Under Article 2 of the regulation concerned, Regulation No. 965/2012 with its amendments is declared applicable in the Republic of Kosovo.

1.1. The activity for which the permit/license is issued

The activity of this license relates to the operation of Heliport - Class A3 according to Regulation 17/2017.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

2.500 Euro.

1.4. Documents required for application:

1. A copy of the Aerodrome Operations and Maintenance Procedures, prepared in accordance with Regulation 3/2012 on Approved Aerodromes and in accordance with the activities expected at the aerodrome;
2. Details of the physical characteristics of the; equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map);
3. Original/certified copy of business registration;
4. Evidence of ownership of the aerodrome or the right of use;
5. Data (CV) for aerodrome senior management staff;
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable Regulation on Fees Levied by the CAA.

2. Recommendations

1. This license is determined by law;

2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing the license;
6. The term of the license shall be determined by regulation;
7. The activity of the licenses should be determined by bylaws;
8. Review the application fee.

3. Justification of recommendations

1. **This license is determined by law:** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions:** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to “Original/certified copy of business registration”. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **The renewal of licenses according to the ex officio principle:** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Draft a special regulation on the procedure and criteria for issuing the license:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA in implementing the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.
6. **The term of the license shall be determined by regulation. In the present case, the term was taken from the data provided by CAA:** However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
7. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

- 8. Review the application fee:** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Moreover, it should be stipulated that the entire fee payment is made only after the license is issued and not at the time of application.

48. CERTIFICATION OF HELIPORTS - CLASS A4

1. Legal basis for issuing the permit/license

This license is not regulated by LCA. Specific provisions regarding this license are not even found in the secondary legislation adopted by CAA. Article 1 of the Regulation No. 4/2015 defines the technical requirements and administrative procedures related to air operations stipulating that “This Regulation lays down detailed rules for air operations with aeroplanes, helicopters, balloons and sailplanes, including ramp inspections of aircraft of operators under the safety oversight of another State when landed at aerodromes located in the territory of the Republic of Kosovo”. However, this regulation does not contain specific provisions for this license, as its preamble states that it is issued taking into account “Regulation CAA No. 3/2010 dated 10 October 2010, which applies in the domestic legal order of the Republic of Kosovo, the Joint Requirements of Aviation Authorities and Applicable Administrative Procedures in Commercial Air Transport - Helicopters, Joint Aviation Requirements (JAR-OPS3) adopted by the Joint Aviation Authorities (JAA)”. Under Article 2 of the regulation concerned, Regulation No. 965/2012 with its amendments is declared applicable in the Republic of Kosovo.

1.1. The activity for which the permit/license is issued

The activity of this license relates to the operation of Heliport - Class A4 according to Regulation 17/2017.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

1.250 Euro.

1.4. Documents required for application:

1. A copy of the Aerodrome Operations and Maintenance Procedures, prepared in accordance with Regulation 3/2012 on Approved Aerodromes and in accordance with the activities expected at the aerodrome;
2. Details of the physical characteristics of the; equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map);
3. Original/certified copy of business registration;
4. Evidence of ownership of the aerodrome or the right of use;
5. Data (CV) for aerodrome senior management staff;
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable Regulation on Fees Levied by the CAA.

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing the license;
6. The term of the license shall be determined by regulation;
7. The activity of the licenses should be determined by bylaws;
8. Review the application fee.

3. Justification of recommendations

1. **This license is determined by law:** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, creating a new article.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions:** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to “Original/certified copy of business registration”. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **The renewal of licenses according to the ex officio principle:** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Draft a special regulation on the procedure and criteria for issuing the license:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA in implementing the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.
6. **The term of the license shall be determined by regulation. In the present case, the term was taken from the data provided by CAA:** However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

7. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
8. **Review the application fee:** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Moreover, it should be stipulated that the entire fee payment is made only after the license is issued and not at the time of application.

49. APPROVAL/CLEARANCE FOR TRANSPORTATION OF DANGEROUS GOODS UNDER SPECIAL CIRCUMSTANCES

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. Provisions relating to dangerous goods, but not related to training organisations for dangerous goods, are Articles 57-59 of the LCA. The rules related to this license are part of Regulation CAA No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air. Article 8 of this Regulation stipulates that “1. Where specifically provided for in the Technical Instructions, the CAAK may issue approval for the carriage of dangerous goods which is forbidden for carriage by air by passenger and/or cargo aircraft, provided that the level of safety in transport achieved is equal to that provided for in the Technical. 2. If there is no specific provision in the Technical Instructions (A1 or A2) authorizing the approval, the operator or its authorized representative may request the exemption”. The license lacks a concrete legal basis.

1.1. The activity for which the permit/license is issued

The activity of this license is the approval/clearance for transportation of dangerous goods.

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

1.000 Euro.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of staff who are certified for transporting dangerous goods;
4. Air operation certificate;
5. Specification of operations;
6. A copy of the permit issued by the host country;

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;

4. Establish an SPC in CAA;
5. The term of the license shall be determined by regulation;
6. The activity of the licenses should be determined by bylaws.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. Given that the license is not defined by law, then the LCA should be amended, introducing a new Article 59.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
6. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

50. REVALIDATION OF THE CERTIFICATE FOR THE TRANSPORTATION OF HAZARDOUS GOODS

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. Provisions relating to dangerous goods, but not related to training organisations for dangerous goods, are Articles 57-59 of the LCA. The rules related to this license are part of Regulation CAA No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air. Article 15.1. of this Regulation stipulates that “Dangerous goods shall be accepted and forwarded by the freight forwarders, the shipper, the service provider accepting and dispatching the cargo, and the designated postal operator to whom the CAAK has issued a Dangerous Goods Certificate”.

1.1. The activity for which the permit/license is issued

The activity of this license is the revalidation of a certificate for the transportation of dangerous goods.

1.2. Validity period of the permit/license

Indefinite.

1.3. Payment for obtaining the permit/license

500 Euro.

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of staff who are certified for transporting dangerous goods;
4. Air operation certificate;
5. Operation specifications;
6. A copy of the permit issued by the host country.

2. Recommendations

1. Clarify the contradiction between the term extension and the name of this license in the sense of the term “renewal”
2. The license should be determined by law.
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.

3. Justification of recommendations

1. **Clarify the contradiction between the term extension and the name of this license in the sense of the term “renewal”:** Based on CAA Regulation No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air [Article 15.3.] “Dangerous goods certificate shall be issued for an indefinite period”. Thus, the name of this license is unclear, due to the fact that it is not clear when there is a need to renew a license that is issued without a term.
2. **The license should be determined by law.** Considering that the sole legal basis of this license is the Regulation CAA No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air, then this CAA license must be defined by law.
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.

51. GROUNDHANDLING SERVICE APPROVAL

1. Legal basis for issuing the permit/license

This approval is regulated only according to Regulation 05/2019 on Amending and Supplementing the Regulation 04/2011 on Access to the Groundhandling Services Market. This regulation, inter alia, was issued based on Articles 15.1(f), 21.2 and 69 of LCA which stipulates that “15.1(f): *The CAA shall be responsible for regulating the economy of airports and air navigation services; 21.2 The General Director shall be authorized to undertake such measures, carry out such investigations and inspections, issue and amend/supplement such orders as well as issue and amend/supplement such special rules,*

regulations and procedures in accordance with the provisions of this law as the General Director reasonably deems necessary for the implementation of the provisions and the exercise of duties and responsibilities determined on the basis of this Law; 69: Groundhandling at airports shall be regulated according to Council of Europe Directive 96/67/EC of 15 October 1996 n access to the groundhandling market at Community airports, and all amendments and supplementations to this Directive. The CAA may make exceptions in accordance with Council of Europe Directive 96/67/EC". Thus, this type of license is not defined by the LCA. Furthermore, the "approval" as a type of license is not recognized by the LCA at all.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is to ensure equal access to the groundhandling service market to improve the quality of service provided to airport users and to maintain a high security level (according to CRLP).

1.2. Validity period of the permit/license:

Seven (7) years.

1.3. Payment for obtaining the permit/license:

Initial approval 5000 EUR. Renewal of approval 2500 Euro. Amendment of approval 2000 Euro. Annual payment 2000 EUR.

1.4. Documents required for application:

1. Business registration certificate issued by the Kosovo authority;
2. Confirmation that the company's accounts have not been blocked in the last six months [Copy]
3. Annual audited accounts for the two most recent financial years [Copy]
4. Insurance policy [Copy]
5. Operations license (if applicable) [Copy]
6. Organizational scheme, list of managing personnel, description of duties and responsibilities [Copy]
7. Equipment in use [Copy]
8. Qualification and requirements for personnel, and relevant training and training plans [Copy]
9. Safety management procedures and standard processing procedures [Copy]
10. Specific handling procedures related to specific operators - customers [Copy]

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize "approvals" as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the

designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA.

2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In this particular case, this can be applied in relation to the “Business Registration Certificate issued by the Kosovo”, the “Certificate of Fulfillment of Tax Liabilities”, and the “Valid Operation License”. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be granted without a certain deadline, the renewal of this license must be done ex officio, through some procedure of ex-officio verification of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

52. APPROVAL FOR THE TRANSPORTATION OF DANGEROUS GOODS BY AIR

1. Legal basis for issuing the permit/license

The legal basis for this Approval is Article 57 of the LCA, which stipulates that “Weapons and munitions, including explosives and noxious or toxic gases, shall only be carried on board an aircraft (i) with the express written permission of the CAA, (ii) under the supervision of the pilot-in command, and (iii) in strict conformity with national and international regulations”. Likewise, Article 8.1. of Regulation No. 04/2020 on the Conditions and Methods of Transporting Dangerous Goods by Air stipulates that “Where specifically provided for in the Technical Instructions, the CAAK may issue approval for the carriage of dangerous goods which is forbidden for carriage by air by passenger and/or cargo aircraft, provided that the level of safety in transport achieved is equal to that provided for in the Technical Instructions”.

1.1. The activity for which the permit/license is issued:

The purpose of this procedure is approval of air operators who wish to transport dangerous goods by air (according to CRLP).

1.2. Validity period of the permit/license:

Two (2) years.

1.3. Payment for obtaining the permit/license:

1000 Euro

1.4. Documents required for application:

1. Information on the applicant (name, surname, address, tel.)
2. Information on the responsible person (first name, last name, position, address, tel.)
3. Expression of interest
4. Application form [Original]
5. Documentation according to the procedure CAAK/DFS/DG-PRC-01 [Original]

2. Recommendations

1. This license is determined by law in terms of compliance with Article 5 of LPLS;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Comply with the principle of official languages;
5. Determine the fee for application by regulation;
6. Establish an SPC in CAA;
7. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license should be harmonized with LPLS.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. LCA does not recognize the word “approval” in the context of these permits and licenses, the legal basis of which is not direct or specific.
2. **Apply the principle of administrative assistance and conducting the procedure ex officio, in terms of the verification of some documents that public institutions possess.** The CAA must apply the principle of administrative assistance during the conduct of the procedure and do this combined with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

4. **Comply with the principle of official languages.** According to Article 5 of the Constitution of the Republic of Kosovo, the official languages in Kosovo are Albanian and Serbian. In the present case, only the general provisions in Regulation No. 5/2013 are in Albanian, while the international standards and recommended practices are only in English. With the aim of complying with the official languages according to the Constitution of the Republic of Kosovo.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
7. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

53. APPROVAL/ENDORSEMENT OF REVISIONS OF OPERATION MANUALS

1. Legal basis for issuing the permit/license

This approval is not provided for by LCA. The CAA Regulation No. 4/2015 Laying Down Technical Requirements and Administrative Procedures Related to Air Operations - Amended by 10/2017, 14/2017 and 15/2017 Regulation No. 06/2015 Laying Down Implementing Rules for the Airworthiness and Environmental Certification of Aircraft and Related Products. Under Article 3.5 point (i) and (ii) of these Regulations it is stipulated that *“In order to facilitate and expedite the regulatory process and to ensure European standardization, the Civil Aviation Authority of Kosovo, the Ministry of Transport and Telecommunication and the Ministry of Internal Affairs are hereby authorized, within their respective areas of competence as specified in the present law, to issue implementing regulations that incorporate by reference (i) the Joint Aviation Requirements and the EU regulations that supersede them and/or (ii) the Civil aviation regulations of other EU and ICAO compliant states”*. As well as Article 15.1 points (a), (d), (e) and (j): *“The CAA shall be responsible for: a) implementing civil aviation legislation and giving effect to policies adopted by the Ministry or the Government in the field of civil aviation; d) issuing licenses, certificates and permits in accordance with the CAA’s competencies and responsibilities referred to in Article 14 and this Article; e) regulating the safety of air transportation in the Republic of Kosovo; j) conducting such investigations and inspections, and issuing such orders, rules, regulations, and/or procedures as the CAA may deem reasonably necessary to properly and lawfully (i) implement the*

applicable provisions of the present law or (ii) discharge the powers and duties assigned to the CAA by the present law. Thus, this type of license is not defined by the LCA.

1.1. The activity for which the permit/license is issued

The aim of this procedure is description of the process and evaluation of documents required for amending and re-approving/endorsing of air operator's operation manuals (according to CRLP).

1.2. Validity period of the permit/license

Indefinite.

1.3. Payment for obtaining the permit/license

According to Article 9.4. of Regulation No. 2/2015 on Fees Levied by the Civil Aviation Authority of Kosovo *"The CAA shall charge and levy a fee for approval of certain parts of the air operator's operations manual (as required by the EU-OPS) at an amount of (€)300.*

1.4. Documents required for application:

1. Organizational structure of the applicant;
2. Standard Operating Procedures;
3. List of certified staff
4. Air operation certificate;
5. Specification of operations.
6. The Operations Manual or parts of the manual that are required to be revised by the operator [Original]
7. OM A (General/Basic Operations Manual) [Original]
8. OM B (Airplane Manual) [Original]
9. OM C (Manual of Routes and their details) [Original]
10. OM D (Training Manual) [Original]
11. GOM - (General/Basic Operations Manual) [Original]
12. QS - (Quality System Manual) [Original]

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Determine the fee for application by regulation;
6. Establish an SPC in CAA;
7. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize "approvals" as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This license must be defined under LCA, through its supplementation.

2. **The term of the license should be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “air operation certificate”. By applying these principles, CAA will avoid submitting these documents and ease the administrative burden for the application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
7. **Draft a special regulation on the procedure and criteria for issuing approvals.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA in implementing the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.

54. AUTHORIZATION FOR INSTRUCTORS

1. Legal basis for issuing the permit/license

This authorization is not provided for by LCA. The CAA Regulation No. 4/2015 Laying Down Technical Requirements and Administrative Procedures Related to Air Operations - Amended by 10/2017, 14/2017 and 15/2017 as well as Regulation No. 06/2015 Laying Down Implementing Rules for the Airworthiness and Environmental Certification of Aircraft and Related Products. Under Article 3.5 point (i) and (ii) of these Regulations it is stipulated that *“In order to facilitate and expedite the regulatory process and to ensure European standardization, the Civil Aviation Authority of Kosovo, the Ministry of Transport and Telecommunication and the Ministry of Internal Affairs are hereby authorized, within their respective areas of competence as specified in the present law, to issue implementing regulations that incorporate by*

reference (i) the Joint Aviation Requirements and the EU regulations that supersede them and/or (ii) the Civil aviation regulations of other EU and ICAO compliant states”. As well as Article 15.1 points (a), (d), (e) and (j): “The CAA shall be responsible for: a) implementing civil aviation legislation and giving effect to policies adopted by the Ministry or the Government in the field of civil aviation; d) issuing licenses, certificates and permits in accordance with the CAA’s competencies and responsibilities referred to in Article 14 and this Article; e) regulating the safety of air transportation in the Republic of Kosovo; j) conducting such investigations and inspections, and issuing such orders, rules, regulations, and/or procedures as the CAA may deem reasonably necessary to properly and lawfully (i) implement the applicable provisions of the present law or (ii) discharge the powers and duties assigned to the CAA by the present law. Thus, this type of license is not defined by the LCA.

1.1 The activity for which the permit/license is issued

The aim of the procedure is the description the process and the checking the required documents. Document checking is necessary to ensure the accuracy of the work (according to CRLP).

1.2 Validity period of the permit/license

Permanent.

1.3 Payment for obtaining the permit/license

50 Euro

1.4 Documents required for application:

1. Information on the applicant (Application)
2. Proof of passing the theoretical and practical exam
3. Flight experience
4. Successful completion of the training program
5. For examiners (holder of instructor license)
6. Payment of application
7. Application [Original]
8. Instructor/Examiner Approval [Original]
9. Proof of passing the theoretical and practical exam [Original]
10. Proof of Application form [Copy]
11. For examiners (instructor license holder of)[Original]

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Determine the fee for application by regulation;
6. Establish an SPC in CAA;
7. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its

Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This license must be defined under LCA, through its supplementation.

2. **The term of the license should be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
7. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of the approval concerned.

55. AUTHORIZATION FOR ORGANIZATIONS FOR PROFESSIONAL TRAINING IN AERODROME OPERATIONS

1. Legal basis for issuing the permit/license

This authorization is not provided for by law. In various CAA regulations, there are provisions that address issues related to the approval of training programs. Such is Article 12 of Regulation (CAA) No.

07/2020 on Professional Training for the Duties of Importance to the Safety of Aerodrome Operations and Certification of the Professional Training Organizations. Paragraph 5 of this Article specifies that “Any change to the training program must be approved by CAA”. Specific provisions for these types of programs were not found in the data provided by CAA. The Authorization must be defined by law, according to Article 17.1 of LPLS.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is the authorization of relevant organizations that organize professional training in the area of aerodrome operations (according to CRLP).

1.2. Validity period of the permit/license:

Five (5) years.

1.3. Payment for obtaining the permit/license:

- 1) Issuing the authorization 1000 Euro;
- 2) Renewal of authorization 500 Euro;
- 3) Changes 250 Euro;
- 4) Annual payment 250 Euro;
- 5) Approval of new instructor 350 Euro.

1.4. Documents required for application:

1. Information on the applicant (name, surname, address, tel.)
2. Data on the person responsible for the organization for professional training (name, surname, tel.)
3. List of planned vocational training programs
4. Details on instructors that will provide vocational training
5. Copy of the operating manual of the organization for vocational training
6. Organizational structure of the organization for vocational training [Copy]
7. Data on instructor and supervisor authorized to carry out professional training in specific areas, in accordance with the vocational training program, and supporting documentation [Copy]
8. Copy of the vocational training respective programs, literature and manuals
9. Samples of vocational training certificates to be issued to successful candidates [Copy]
10. Details and description/list of equipment, tools and instruments to be used when providing theoretical lectures, practical exercises and on-job training [Copy]
11. Sketch and description of spaces in which theoretical lectures, practical exercises, and on the job training will be conducted [Copy]
12. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable regulation on fees levied by the CAA [Copy]

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Determine the fee for application by regulation;
6. Establish an SPC in CAA;
7. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “authorizations” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This can be achieved through amending and supplementing LCA.
2. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be granted without a certain deadline, the renewal of this license must be done ex officio, through some procedure of ex-officio verification of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
7. **Draft a special regulation on the procedure and criteria for issuing the license:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of the approval concerned.

56. KNOWLEDGE TEST CERTIFICATE

1. Legal basis for issuing the permit/license

This certificate is not determined by law. This certificate is based on the Regulation CAA No. 4/2015 Laying Down Technical Requirements and Administrative Procedures Related to Air Operations - Amended by 10/2017, 14/2017 and 15/2017; Regulation No. 06/2015 Laying Down Implementing Rules for the Airworthiness and Environmental Certification of Aircraft and Related Products. Regulation (CAA) No. 01/2021 on Amending and Supplementing the Regulation No. 01/2017 Unmanned Aircraft Systems (SAP) as well as Regulation 01.2017 Unmanned Aircraft Systems (SAP). Under Article 3.5 point (i) and (ii) of these Regulations it is stipulated that *“In order to facilitate and expedite the regulatory process and to ensure European standardization, the Civil Aviation Authority of Kosovo, the Ministry of Transport and Telecommunication and the Ministry of Internal Affairs are hereby authorized, within their respective areas of competence as specified in the present law, to issue implementing regulations that incorporate by reference (i) the Joint Aviation Requirements and the EU regulations that supersede them and/or (ii) the civil aviation regulations of other EU and ICAO compliant states”*. As well as Article 15.1 points (a), (d), (e) and (j): *“The CAA shall be responsible for: a) implementing civil aviation legislation and giving effect to policies adopted by the Ministry or the Government in the field of civil aviation; d) issuing licenses, certificates and permits in accordance with the CAA’s competencies and responsibilities referred to in Article 14 and this Article; e) regulating the safety of air transportation in the Republic of Kosovo; j) conducting such investigations and inspections, and issuing such orders, rules, regulations, and/or procedures as the CAA may deem reasonably necessary to properly and lawfully (i) implement the applicable provisions of the present law or (ii) discharge the powers and duties assigned to the CAA by the present law.*

Thus, this type of license is not determined by LCAA and lacks a legal basis, and this should therefore be established through amending LCA, based on Article 17.1 of the LPSL.

1.1. The activity for which the permit/license is issued

The aim of the procedure is to certify applicants through the knowledge test.

1.2. Validity period of the permit/license

Indefinite time limit

1.3. Payment for obtaining the permit/license

A candidate shall pay the fee of 25 € for Category 3 and 50 € for Category 4

1.4. Documents required for application

1. Application to take a test;
2. Personal data
3. Completed form [Original]
4. Evidence on payment of the fee for the test [Original]
5. Copy of passport or ID card of the applicant

2. Recommendations

1. This license is determined by law;
2. The term of the license shall be determined by regulation;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;

5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This license has no legal basis, therefore it is recommended to amend and supplement the LCA through a new article.
2. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of the approval concerned.

57. AIRWORTHINESS CERTIFICATE

1. Legal basis for issuing the permit/license

This certificate is not determined by LCA. This certificate is dealt with in Regulation (AAC) No. 06/2023 Amending Regulation (CAA) No. 15/2017 on additional airworthiness specifications; respectively Regulation No. 6/2015 Laying Down Implementing Rules for the Airworthiness and Environmental Certification of Aircraft and Related Products, Parts and Appliances, as well as for the Certification of Design and Production Organisations. Thus, this type of license is not determined by LCA and lacks a legal basis, and this should therefore be established through amending the LPSL.

1.1. The activity for which the permit/license is issued

The purpose of this administrative procedure is issuing certificate of aircraft airworthiness (according to CRLP).

1.2. Validity period of the permit/license

No time limit.

1.3. Payment for obtaining the permit/license

Commercial Air Transport: 700 Euro

Private: 350 Euro

General Commercial Transport: 300 Euro

Private: 150 Euro

Commercial Air Transport: 100 Euro

Private: 50 Euro

1.4. Documents required for application:

1. Contact information of the applicant (owner/user of the aircraft)
2. Information regarding Declaration of Conformity for new airplane
3. Party Letter [Copy]
4. Information on aircraft [Original]
5. Declaration of conformity for new aircraft [Original]
6. Insurance policy [Original]

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. The term of the license shall be determined by regulation;
6. The activity of the licenses should be determined by bylaws.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for

application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
6. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

58. EXPORT AIRWORTHINESS CERTIFICATE

1. Legal basis for issuing the permit/license.

This certificate is not determined by LCA. This certificate is dealt with in Regulation (AAC) No. 06/2023 Amending Regulation (CAA) No. 15/2017 on additional airworthiness specifications; respectively Regulation No. 6/2015 Laying Down Implementing Rules for the Airworthiness and Environmental Certification of Aircraft and Related Products, Parts and Appliances, as well as for the Certification of Design and Production Organisations. Thus, this type of license is not determined by LCA and lacks a legal basis, and this should therefore be established through amending the LPSL.

1.1. The activity for which the permit/license is issued

The purpose of this administrative procedure is certification of entities for assessing export airworthiness (CRLP).

1.2 Validity period of the permit/license

No time limit.

1.3 Payment for obtaining the permit/license

1500euro

1.4 Documents required for application

1. Contact information of the applicant (owner/user of the aircraft)
2. Information on aircraft

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;
4. The term of the license shall be determined by regulation;
5. The activity of the licenses should be determined by bylaws.

3. Justification of recommendations

1. This license must be determined by law. LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.

4. Renewal of licenses should be done ex officio. In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

5. Establish an SPC in CAA. A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

6. The term of the license shall be determined by regulation. In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

7. The activity of the licenses should be determined by bylaws: Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

59. RESTRICTED AIRWORTHINESS CERTIFICATE

1. Legal basis for issuing the permit/license.

This certificate is not determined by LCA. This certificate is dealt with in Regulation (AAC) No. 06/2023 Amending Regulation (CAA) No. 15/2017 on additional airworthiness specifications; respectively Regulation No. 6/2015 Laying Down Implementing Rules for the Airworthiness and Environmental Certification of Aircraft and Related Products, Parts and Appliances, as well as for the Certification of Design and Production Organisations. Thus, this type of license is not determined by LCA and lacks a legal basis, and this should therefore be established through amending the LPSL.

1.1 The activity for which the permit/license is issued

The purpose of this administrative procedure is to issue an aircraft airworthiness certificate.

1.2 Validity period of the permit/license:

No time limit.

1.3 Payment for obtaining the permit/license:

Commercial Air Transport: 700 Euro

Private: 350 Euro

General Commercial Transport: 300 Euro

Private: 150 Euro

Commercial Air Transport: 100 Euro

Private: 50 Euro

1.4 Documents required for application:

1. Name, surname and address of applicant
2. Name of the enterprise
3. Party's ID card [Original]
4. Information on aircraft [Original]
5. Business Registration Certificate [Original]
6. Insurance policy [Original]

2 Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;

3 Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Business Registration Certificate issued by the Kosovo authority”. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and

also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

60. DANGEROUS GOODS CERTIFICATE

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. Provisions relating to dangerous goods are referred in Article 57-59 of the LCA. The rules related to this license are part of Regulation CAA No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air. Article 15.1. of this Regulation stipulates that “Dangerous goods shall be accepted and forwarded by the freight forwarders, the shipper, the service provider accepting and dispatching the cargo, and the designated postal operator to whom the CAAK has issued a Dangerous Goods Certificate”.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is to define that dangerous goods should be accepted and forwarded only to those entities (consignors, freight forwarders, land treatment service providers, cargo handling agents and operators) to whom the CAAK has issued the certificate as being competent to carry out such operations, and which are in possession of a valid certificate for dangerous goods (according to CRLP).

1.2. Validity period of the permit/license

2 years

1.3. Payment for obtaining the permit/license

500 Euro.

1.4. Documents required for application:

1. Information on the applicant (name, surname, address, tel.)
2. Organizational chart of the organization [Original]
3. Standard Operating Procedures (or other relevant document) describing a detailed process of receiving and handling cargoes and/or cargoes of dangerous goods. [Original]
4. List of employees who are in possession of valid goods certificates for dangerous goods (for categories 1, 2, 3 and 6) in accordance with provision 1; 4.2 (Table 1-4) of the Technical [Original]
5. Copy of valid DG Certificates for the employees referred to in 4.3
6. Air Operation Certificate (AOC) (if applicable) [Original]
7. Operations specifications (if applicable) [Original]
8. A copy of the permit / approval / certificate issued to the operator by the competent authority of the operator's state that allows the transport of dangerous goods by air (if applicable) [Original]

2. Recommendations

1. This license is determined by law in terms of compliance with Article 5 of LPLS;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Comply with the principle of official languages;
5. Determine the fee for application by regulation;
6. Establish an SPC in CAA;
7. Draft a special regulation on the procedure and criteria for issuing the license.

3. Justification of recommendations

1. This license should be harmonized with LPLS. LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. LCA does not recognize the word “approval” in the context of these permits and licenses, the legal basis of which is not direct or specific.

2.

4. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions. The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the specific case, this can be applied in relation to the “Air Operation Certificate”. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.

5. The renewal of licenses should be done according to the ex officio principle. In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

6. Comply with the principle of official languages. According to Article 5 of the Constitution of the Republic of Kosovo, the official languages in Kosovo are Albanian and Serbian. In the present case, only the general provisions in Regulation No. 5/2013 are in Albanian, while the international standards and recommended practices are only in English. With the aim of complying with the official languages according to the Constitution of the Republic of Kosovo.

7. Determine the fee for application by regulation. In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

8. Establish an SPC in CAA. A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

9. Draft a special regulation on the procedure and criteria for issuing the license. In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of the approval concerned.

61. NOISE CERTIFICATE

1. Legal basis for issuing the permit/license

This type of license is not defined by law. The basis on which this type of license is issued is Regulation (CAA) No. 09/2023 Amending Regulation (CAA) No. 06/2015 on the tasks of certification, supervision and implementation of the competent authorities in the implementation of the rules regarding the organizations involved in the design and production of aircraft used for sports and recreational aviation.

1.1. The activity for which the permit/license is issued

The purpose of this administrative procedure is to simplify the use of legal basis for granting aircraft noise certificate.

1.2. Validity period of the permit/license

No limit.

1.3. Payment for obtaining the permit/license

200 Euro

1.4. Documents required for application

1. Contact information of the applicant
2. Information on aircraft [Original]

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;
6. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law.
2. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **The renewal of licenses should be done according to the ex officio principle.** To ease applicant's administrative burden, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 1.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
6. **Draft a special regulation on the issuance procedure and criteria.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of the approval concerned.

62. TRAINING ORGANIZATION CERTIFICATION

1. Legal basis for issuing the permit/license.

This license is not determined by law. The provisions related to this license are part of Regulation No. 19/2017 Laying Down Technical Requirements and Administrative Procedures Related to Licenses and Certificates of Air Traffic Controllers.

1.1 The activity for which the permit/license is issued

The aim of this procedure is to ensure that a training organization provides a safe, quality and efficient service complying with the rules and the highest standards for safety in civil aviation, according to the Law on Civil Aviation (Ref. ICAO Convention and EU legal acts (according to CRLP).

1.2 Validity period of the permit/license

Two (2) to six (6) years.

1.3 Payment for obtaining the permit/license

2,000.00 € for issuing a certificate,
€1,000.00 for renewing the certificate,
500.00 € for modifying the certificate.

1.4 Documents required for application:

1. Name, surname and address of applicant
2. Company address
3. Phone number, fax number and e-mail address of the responsible person
4. Description of services application is filed for
5. A statement signed by the Chief Executive Officer or equivalent confirming that the organization and any reference documentation referred to defines the current and ongoing compliance of the organization with all the applicable requirements and agrees to provide the CAA with any information on the description [Original]

6. The organization's security policy in accordance with the Directives of the Common Requirements [Original]
7. Titles and names of senior management [Original]
8. The organization's security policy in accordance with the Directives of the Common Requirements [Original]
9. The organization's security policy in accordance with the Directives of the Common Requirements [Original]
10. An overview of the resources of the workforce [Original]
11. A general description of the organization's facilities and equipment [Original]
12. Scope of services to be provided under this certificate [Original]
13. Procedure for amending the CAA's description and notification of any change [Original]

2. Recommendations

1. This license is determined by law in terms of compliance with Article 5 of LPLS;
2. Define by regulation precise and objective criteria for determining the deadline;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Comply with the principle of official languages;
6. Establish an SPC in CAA;
7. Determine the fee for application by regulation

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.
2. **Define by regulation precise and objective criteria for determining the deadline.** Definition of the term for this license is important due to the principle of legal certainty for the applicant, in terms of stability and duration. Therefore, objective and measurable criteria should be set in the regulations regarding the duration of the license. This is especially true when the license does not have a specific duration, as in this case.
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA must apply the principle of administrative assistance when conducting the procedure and do this combined with the principle of conducting the procedure ex officio. By applying these principles, the CAA will avoid the delivery of these documents and will facilitate the administrative burden for application.
4. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Comply with the principle of official languages.** According to Article 5 of the Constitution of the Republic of Kosovo, the official languages in Kosovo are Albanian and Serbian. In the present case,

only the general provisions in Regulation No. 5/2013 are in Albanian, while the international standards and recommended practices are only in English. With the aim of complying with the official languages according to the Constitution of the Republic of Kosovo.

- 6. Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
- 7. Determine the fee for application by regulation.** In the CAA regulation on fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

63. CERTIFICATION AND LICENSING OF MEDICAL PERSONNEL

1 Legal basis for issuing the permit/license

Article 37 of LCA recognizes licenses for aviation personnel, namely for personnel required to have the corresponding qualification. The legal basis for issuing this license is Articles 37-39 of LCA. Article 37 of the LCA stipulates that “Any person acting as an airman shall hold an appropriate license and rating granted or rendered valid by the CAA under the present law and the relevant implementing regulations. Rating refers to an entry on a license stating special conditions, privileges or limitations. This procedure also applies to air navigation and maintenance personnel as well as flight operations officers, aeronautical station operators and flight instructors”, but there is no reference to the medical personnel.

1.1 The activity for which the permit/license is issued

The purpose of the administrative procedure is certification of medical personnel for air traffic controllers (according to CRLP).

1.2 Validity period of the permit/license

N/A

1.3 Payment for obtaining the permit/license

N/A

1.4 Documents required for application

- 1 Application form [Original]
- 2 Medical examination report [Original]

2 Recommendations

1. This license is determined by law in terms of designation;
2. The term of the license shall be determined by regulation;

3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Renewal of licenses should be done ex officio;
5. Determine the fee for application by regulation;
6. Establish an SPC in CAA;

3 Justification of recommendations

1. **This license should be determined by law in terms of designation.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. The LCAA does not recognize the term approval pursuant to Article 67, therefore the legal basis of this permit and license must be specified by supplementing Article 67 of LCAA.
2. **The term of the license shall be determined by regulation.** In the present case, no provision has been found that refer to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted. The objective and measurable criteria should be set in regulation regarding the duration of the license.
3. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
4. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Determine the fee for application by regulation.** The CAA regulation on fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

64. CERTIFICATION OF AERODROMES - CLASS A

1. Legal basis for issuing the permit/license

Article 61.1 of LCA stipulates that “Any person who wants to take over the operation (management) of an Aerodrome must apply for an operation certificate from CAA”. However, the LCA does not contain provisions regarding the modification of the Aerodrome Certificate. Therefore, this license is determined by law. The rules related to the modification of the certificate are defined in Regulation (AAC) No. 06/2019 Amending and Supplementing Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes and in Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes [ADR.AR.C.040 Modifications].

1.1. The activity for which the permit/license is issued

The purpose of this procedure is to regulate the security of aerodromes for public use, in the service of air transport operations of local and international air operators and providing aerodrome operating certificates for public use, in the service of air transport operations of local and international air operators (according to CRPL).

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Initial certification 20000 Euro.

Renewal of certificate 10000 Euro.

Amendment/transfer of certificate 20000 Euro.

Annual payment 5000 EUR.

1.4. Documents required for application

1. A copy of the Aerodrome Manual, adequate for expected activities of airplanes in an aerodromes [Original]
2. Details of the physical characteristics of the aerodrome, equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map) [Original]
3. Original/certified copy of business registration [Original]
4. Proof of ownership of the aerodrome or the right of use [Original]
5. Data (CV) on aerodrome senior management staff [Original]
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable regulation on fees levied by the CAA [Original]

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the

designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. This recommendation can be implemented by amending and supplementing the LCA.

2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied regarding the “original/certified copy of business registration” and “evidence of aerodrome ownership or the right of use”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible to issue this license without a specified term, the renewal of this license should be done ex-officio, through a procedure of ex-officio verification of the facts, and not through a new administrative application process. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 20.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

65. CERTIFICATION OF AERODROMES - CLASS B

1. Legal basis for issuing the permit/license

Article 61.1 of LCA stipulates that “Any person who wants to take over the operation (management) of an Aerodrome must apply for an operation certificate from CAA”. However, the LCA does not contain provisions regarding the modification of the Aerodrome Certificate. Therefore, this license is determined by law. The rules related to the modification of the certificate are defined in Regulation (AAC) No. 06/2019 Amending and Supplementing Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes and in Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes [ADR.AR.C.040 Modifications].

1.1. The activity for which the permit/license is issued

The purpose of this procedure is to regulate the security of aerodromes for public use, in the service of air transport operations of local and international air operators and providing aerodrome operating certificates for public use, in the service of air transport operations of local and international air operators (according to CRPL).

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Initial certification 10000 Euro.

Renewal of certificate 5000 Euro.

Amendment/transfer of certificate 10000 Euro.

Annual payment 2500 EUR.

1.4. Documents required for application

1. A copy of the Aerodrome Manual, adequate for expected activities of airplanes in an aerodrome
2. Details of the physical characteristics of the aerodrome, equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map) [Original]
3. Original/certified copy of business registration
4. Proof of ownership of the aerodrome or the right of use [Original]
5. Data (CV) on aerodrome senior management staff [Copy]
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable regulation on fees levied by the CAA [Original]

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. This is because there are no concrete provisions in the LCA that refer to the modification of this license. The LCA should therefore be supplemented in Article 62.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied regarding the “original/certified copy of business registration” and “evidence of aerodrome ownership or the right of use”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for

application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 10.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

66. CERTIFICATION OF AERODROMES - CLASS C

1. Legal basis for issuing the permit/license

Article 61.1 of LCA stipulates that “Any person who wants to take over the operation (management) of an Aerodrome must apply for an operation certificate from CAA”. However, the LCA does not contain provisions regarding the modification of the Aerodrome Certificate. Therefore, this license is determined by law. The rules related to the modification of the certificate are defined in Regulation (AAC) No. 06/2019 Amending and Supplementing Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes and in Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes [ADR.AR.C.040 Modifications].

1.1. The activity for which the permit/license is issued

The purpose of this procedure is to regulate the security of aerodromes for public use, in the service of air transport operations of local and international air operators and providing aerodrome operating certificates for public use, in the service of air transport operations of local and international air operators (according to CRPL).

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Initial certification 5000 Euro.

Renewal of certificate 2500 Euro.

Amendment/transfer of certificate 5000 Euro.

Annual payment 1500 EUR.

1.4. Documents required for application

1. A copy of the Aerodrome Manual, adequate for expected activities of airplanes in an aerodrome
2. Details of the physical characteristics of the aerodrome, equipment, services and crafts, including aeronautical maps (aerodrome map and barrier map) [Copy]
3. Original/certified copy of business registration
4. Proof of ownership of the aerodrome or the right of use [Original]
5. Data (CV) on aerodrome senior management staff [Copy]

6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable regulation on fees levied by the CAA [Original]

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.
2. **Regulate more specifically who has the right to apply for this license.** This recommendation
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied regarding the “original/certified copy of business registration” and “evidence of aerodrome ownership or the right of use”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
4. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
6. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

67. CERTIFICATION OF AUTHORIZED MEDICAL EXAMINERS

1. Legal basis for issuing the permit/license

This license is not determined by LCA. Article 37 of LCA recognizes licenses for aviation personnel, namely for personnel required to have the corresponding qualification. The legal basis for issuing this license is Articles 37-39 of LCA. Article 37 of the LCA stipulates that “Any person acting as an airman shall hold an appropriate license and rating granted or rendered valid by the CAA under the present law and the relevant implementing regulations. Rating refers to an entry on a license stating special conditions, privileges or limitations. This procedure also applies to air navigation and maintenance personnel as well as flight operations officers, aeronautical station operators and flight instructors”, but there is no reference to the medical personnel or authorized medical examiners. The provisions related to this license are part of Regulation (CAA) No. 04/2022 Amending Regulation (CAA) No. 05/2015 Laying Down Technical criteria and Administrative Procedures Related to Civil Aviation Aircrew Pursuant Regulation (CAA) No. 05/2020.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is to create the most adequate conditions for the health care of workers involved in aircraft operations (according to CRLP).

1.2. Validity period of the permit/license

Three (3) years.

1.3. Payment for obtaining the permit/license

N/A

1.4. Documents required for application:

1. Application for approval of authorized medical examiners [Original]
2. Diploma of relevant education [Original]

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;
4. The activity of the licenses should be determined by bylaws;
5. Determine the fee for application by regulation.
6. The term of the license shall be determined by regulation.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.

2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
5. **Determine the fee for application by regulation:** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **The term of the license should be determined by regulation:** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.

68. CERTIFICATION OF HELIPORTS

1. Legal basis for issuing the permit/license

This type of license is not defined by law. Article 61.1 of LCA stipulates that “Any person who wants to take over the operation (management) of an Aerodrome must apply for an operation certificate from CAA”. However, the LCA does not contain provisions regarding the modification of the Aerodrome Certificate. Therefore, this license is determined by law. The rules related to the modification of the certificate are defined in Regulation (AAC) No. 06/2019 Amending and Supplementing Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes and in Regulation No. 17/2017 on Requirements and Administrative Procedures Related to Aerodromes [ADR.AR.C.040 Modifications]. According to Regulation No. 03/2014 on the Take-Off and Landing of Helicopters Outside Aerodrome Areas, namely Article 2: *“Aerodrome” means a defined area on land (including any buildings, installations and equipment) intended to be used either wholly or in part for the arrival, departure and surface movement of aircraft. In this regulation, the term Aerodrome includes the heliport, airfields, and gliding fields. “Heliport” means an aerodrome or a defined area on a structure intended to be used wholly or in part for the arrival, departure and surface movements of helicopters;*

1.1. The activity for which the permit/license is issued

The purpose of this administrative procedure is granting heliport operating certificates for public use, in the service of air transport operations of local and international air operators (according to CRLP).

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

Initial certification 5000 Euro.

Renewal of certificate 2500 Euro.

Amendment/transfer of certificate 5000 Euro.

Annual payment 1250 EUR.

1.4. Documents required for application

1. A copy of the Heliport Manual, adequate for expected activities of helicopters in a heliport
2. Details of the physical characteristics of the heliport, equipment, services and crafts, including aeronautical maps (heliport map and barrier map) [Original]
3. Original/certified copy of business registration
4. Proof of ownership of the heliport or the right of use [Original]
5. Data (CV) on aerodrome senior management staff [Copy]
6. Evidence of payment of 50% of the amount of the fee, in accordance with the applicable regulation on fees levied by the CAA [Original]

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Review the application fee;
5. Establish an SPC in CAA;

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.
2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied regarding the “original/certified copy of business registration” and “evidence of aerodrome ownership or the right of use”. By applying these principles, CAA will avoid the submission of some documents and will simplify the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a

verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

4. **Review the application fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. In the specific case, the payment of 5.000 Euro seems not to have followed a proportional approach. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS. Additionally, it should be specified that the entire fee payment is made only after the license is issued, and not as it currently stands, where half of the fee must be paid upon application.
5. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.

69. CERTIFICATION OF AIR NAVIGATION SERVICE PROVIDERS

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. A general provision referring to regulation of air navigation services is Article 79 of the LCA, which stipulates that “The regulation of air navigation services shall, where applicable, be based on ICAO, EU/ECAA, EASA and EUROCONTROL rules. The CAA will issue regulations which are based on or which are in accordance with the rules of the aforementioned organizations, related to the provision of local air navigation services. The rules related to the certification of Air Navigation Service Providers, which mainly present authorization for CAA for further regulation by bylaws, are defined in part 5 of LCA. Regarding bylaws, the provisions related to this license are defined in Regulation (CAA) No. 09/2020 on Laying Down Common Requirements for Providers of Air Traffic Management/Air Navigation Services and Other air Traffic Management Network Functions and Their Oversight. And in the CAA Regulation No. 19/2017 Laying Down Technical Requirements and Administrative Procedures Related to Licenses and Certificates of Air Traffic Controllers, the license is contrary to Article 17.1 of LCAA.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is to ensure that an air navigation service provider provides a safe, quality and efficient service complying with the rules and the highest standards for safety in civil aviation, according to the Law on Civil Aviation (according to CRLP).

1.2. Validity period of the permit/license

Not precisely defined. Minimal time period is 2 years, and maximum is 6 years.

1.3. Payment for obtaining the permit/license

20,000.00 € to issue a certificate,

10,000.00 € for renewal of certificate

1.4. Documents required for application:

1. A statement signed by the Chief Executive Officer or equivalent confirming that the organization and any reference documentation referred to defines the current and ongoing compliance of the organization with all the applicable requirements and agrees to provide the CAA with any information on the description [Original]
2. The organization's security policy in accordance with the Directives of the Common Requirements ;[Original]
3. Titles and names of senior management; [Original]
4. The organization's security policy in accordance with the Directives of the Common Requirements; [Original]
5. The organization's security policy in accordance with the Directives of the Common Requirements; [Original]
6. An overview of the resources of the workforce [Original]
7. A general description of the organization's facilities and equipment [Original]
8. Scope of services to be provided under this certificate [Original]
9. Procedure for amending the CAA's description and notification of any change; [Original]

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;
4. Reconsider the fee;
5. Draft a special regulation on the procedure and criteria for issuing approvals;
6. Determine whether natural or legal entities have the right to apply for this license.

3. Justification of recommendations

1. **This license is determined by law:** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.
2. **Renewal of licenses should be done ex officio:** In cases where it is not possible for this license to be granted without a certain deadline, the renewal of this license must be done ex officio, through some procedure of ex-officio verification of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Reconsider the fee.** LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. In the present case, the fee of 20,000 Euro for the issuance of this license does not seem to be in accordance with this principle. Also, the revision fee should be waived, in the case of this license.

5. **Draft a special regulation on the procedure and criteria for issuing the license:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of the approval concerned.
6. **Determine whether natural or legal entities have the right to apply for this license.** It is not specified in the LCA and regulations who can apply for this license. Therefore, it is imperative to clarify by law which licenses apply to natural persons and which apply to legal persons.

70. CERTIFICATION OF AIRCRAFT OPERATORS FOR AIR OPERATIONS

1. Legal basis for issuing the permit/license

This license is not specifically provided by the LCA. The legal basis for Air Operator Certificate (including the certification of aircraft operators to work on air) is found in Article 32 of LCA, which stipulates that “Any Citizen of the Republic of Kosovo desiring to engage in air activities (operations) in Kosovo shall obtain and possess a current and valid Air Operator’s Certificate (“AOC”) issued by the CAA”. Also, regarding this license, Article 33 of LCA stipulates that “1. All requirements for an AOC shall be established by the CAA in implementing regulations issued under the authority of this Law”. 2. CAA must ensure that these regulations meet the applicable conditions of ECAA and EASA”.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is to describe and simplify the process and the control and evaluation of necessary documents for certification of air operator operating on air. Document checking is necessary to ensure the accuracy of the work (according to CRLP).

1.2. Validity period of the permit/license

Indefinite.

1.3. Payment for obtaining the permit/license

1. Commercial air transport - less than 2730 kg 400.00 Euro;
2. Commercial air transport - from 2730 kg up to 5700 kg 1,500.00 Euro;
3. Commercial aviation - from 5700 kg up to 40000kg 3,000.00 Euro;
4. Commercial aviation - more than 40000 kg 4,000.00 Euro.

1.4. Documents required for application

1. Application for Air Operator Certificate AOC for air operation [Original]
2. Request for special approvals [Original]
3. Contact information of the applicant/operator [Original]
4. Operations Manual (OM A, B, C, D, GOM and QS) [Original]
5. Aircraft/Helicopter Leasing Contracts [Original]
6. Maintenance contract [Original]
7. Flight and Cabin Crew training center contract (if any) [Original]
8. List of Key Managers and their Deputies (CAAK-EASA Form 4) [Original]

2. Recommendations

1. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
2. Renewal of licenses should be done ex officio;
3. Establish an SPC in CAA;
4. Draft a special regulation on the procedure and criteria for issuing the license.
5. Determine the fee for application by regulation
6. The designation of this license should be harmonized with the LCA
7. The activity of the licenses should be determined by bylaws

3. Justification of recommendations

1. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be granted without a certain deadline, the renewal of this license must be done ex officio, through some procedure of ex-officio verification of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of said approval.
5. **Determine the fee for application by regulation.** In the CAA regulation on fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
6. **The designation of this license should be harmonized with the LCA:** Article 5 of LPLS specifies the types of permits. In the specific case, it is about permits, not licenses, but it still goes through the approval procedure. Therefore, this must be done according to the designations defined by Article 5 of LPLS, such as notification, permit registration, etc.

7. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

71. PERMIT FOR TRANSPORT OF WEAPONS, PARTS OF WEAPONS AND AMMUNITION

1. Legal basis for issuing the permit/license

The legal basis for this permit is found in Law No. 05/1 -022 on Weapons, in article 24, paragraph 1 (1.6): “*Types of Permits for Legal Entities are: 1.6. weapon transport permit*”, and Article 30, paragraph 1: “*A permit from the competent authority is required for any transport of weapons, weapon parts and ammunition*”. This license is not provided by the LCA. Provisions relating to dangerous goods are referred in Article 57-59 of the LCA.

1.1. The activity for which the permit/license is issued:

The purpose of this procedure is to regulate the arms and ammunition transport market for legal entities (according to the CRLP).

1.2. Validity period of the permit/license:

90 days.

1.3. Payment for obtaining the permit/license:

500 Euro.

1.4. Documents required for application:

1. Verification of the competent body that they possess a storage room for firearm and ammunition [Copy]
2. Business Registration Certificate [Copy]
3. Court certificate that the work of the legal entity is not forbidden or terminated by a final court decision of the competent Court [Original]
4. Background verification of the past history of applicants, the founders, owners or responsible persons [Original]

2. Recommendations

1. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
2. Set the application fee by regulation (according to the CAA needs);

3. Justification of recommendations

1. **Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. In the present case, this can be applied in relation to the “Business Registration Certificate”. By applying these principles, the CAA will avoid submitting these documents and ease the administrative burden for the application.
2. **Determine the fee for application by regulation.** The CAA regulation on fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws.

LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

72. RENEWAL OF THE CERTIFICATE FOR THE TRANSPORTATION OF DANGEROUS GOODS

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. Provisions relating to dangerous goods are referred in Article 57-59 of the LCA. The rules related to this license are part of Regulation CAA No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air. Article 15.1. of this Regulation stipulates that “Dangerous goods shall be accepted and forwarded by the freight forwarders, the shipper, the service provider accepting and dispatching the cargo, and the designated postal operator to whom the CAAK has issued a Dangerous Goods Certificate”.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is to define that dangerous goods should be accepted and forwarded only to those entities (consignors, freight forwarders, land treatment service providers, cargo handling agents and operators) to whom the CAAK has issued the certificate as being competent to carry out such operations, and which are in possession of a valid certificate for dangerous goods (according to CRLP).

1.2. Validity period of the permit/license

Indefinite.

1.3. Payment for obtaining the permit/license

500 Euro.

1.4 Documents required for application:

1. Organizational chart of the organization [Original]
2. Standard Operating Procedures (or other relevant document) describing a detailed process of receiving and handling cargoes and/or cargoes of dangerous goods. [Original]
3. List of employees who are in possession of valid goods certificates for dangerous goods (for categories 1, 2, 3 and 6) in accordance with provision 1; 4.2 (Table 1-4) of the Technical [Original]
4. Copy of valid DG Certificates for the employees referred to in 4.3
5. Air Operation Certificate (AOC) (if applicable) [Original]
6. Operations specifications (if applicable) [Original]
7. A copy of the permit / approval / certificate issued to the operator by the competent authority of the operator's state that allows the transport of dangerous goods by air (if applicable) [Original]

2. Recommendations

1. Clarify the contradiction between the term extension and the name of this license in the sense of the term “renewal”

3. Justification of recommendations

1. **Clarify the contradiction between the term extension and the name of this license in the sense of the term “renewal”:** Based on CAA Regulation No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air [Article 15.3.] “Dangerous goods certificate shall be issued for an indefinite period”. Thus, the name of this license is unclear, due to the fact that it is not clear when there is a need to renew a license that is granted indefinitely.

73. APPROVAL OF COORDINATOR FOR HAZARDOUS GOODS³

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. Provisions relating to dangerous goods, but not related to training organisations for dangerous goods, are Articles 57-59 of the LCA. The rules related to this license are part of Regulation CAA No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods by Air. Article 16 of this Regulation defines who and how the approval of the coordinator for dangerous goods can be done.

1.1. The activity for which the permit/license is issued

The activity of this license is the approval of dangerous goods coordinator.

1.2. Validity period of the permit/license

N/A

1.3. Payment for obtaining the permit/license

50 Euro.

1.4. Documents required for application:

1. CV [Original]
2. Copy of respective diplomas and certificates
3. Other supportive documents
4. Payment of the fee [Original]

2. Recommendations

1. This license is determined by law;
2. Renewal of licenses should be done ex officio;
3. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
4. Establish an SPC in CAA;
5. The term of the license shall be determined by regulation;
6. The activity of the licenses should be determined by bylaws;
7. Draft a special regulation on the procedure and criteria for issuing the license.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws,

³ This service is not found in the Central Registry of Permits and Licenses (CRPL).

and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.

2. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
6. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
7. **Draft a special regulation on the procedure and criteria for issuing the license:** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in facilitating the procedures for issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance concerned. In the present case, the documents necessary for the application were obtained from the data provided by the Central Registry of Permits and Licenses.

74. CERTIFICATION OF TRAINING PROVIDERS IN THE AREA OF TRANSPORTATION OF DANGEROUS GOODS

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. Provisions relating to dangerous goods, but not related to training organisations for dangerous goods, are Articles 57-59 of the LCA. The rules related to this license are part of Regulation CAA No. 04/2020 on Conditions and Methods of Transporting Dangerous Goods

by Air. Article 30.1. of this Regulation stipulates that “Training in dangerous goods may be conducted by a service provider to whom the CAAK has issued a certificate”.

1.1. The activity for which the permit/license is issued

The purpose of this procedure is the certification of providers aimed at conducting training for dangerous goods (according to CRPL).

1.2. Validity period of the permit/license

2 years

1.3. Payment for obtaining the permit/license

500 Euro.

1.4. Documents required for application:

1. Application form for issuing the certificate to the training provider [Original]
2. Description of the organizational structure [Original]
3. List of qualifications of leading staff and instructors [Original]
4. Description of classrooms and other facilities [Original]
5. Description of the training program, including manuals, curricula, timetables and teaching materials [Original]
6. Description of the quality assurance system [Original]

2. Recommendations

1. This license is determined by law;
2. Establish an SPC in CAA;
3. The activity of the licenses should be determined by bylaws.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This law does not recognize “approvals” as types of permits, defined in its Article 5. Therefore, this issue should be addressed by LCA and the relevant bylaws and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.
2. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
3. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.

75. LICENSE FOR PARAGLIDING, RENEWAL OF PARAGLIDING LICENSE, LICENSE CONVERSION, REVALIDATION, ETC.

1. Legal basis for issuing the permit/license

This license is not provided for by LCA. Provisions related to Licensing and Classification of Aviation Personnel are found in Article 37 of the LCA stipulates that “Any person acting as an airman shall hold an appropriate license and rating granted or rendered valid by the CAA under the present law and the relevant implementing regulations. Rating refers to an entry on a license stating special conditions, privileges or limitations. The foregoing also applies to air navigation and maintenance personnel as well as flight operations officers, aeronautical station operators and flight instructors”. The rules related to this license are part of Regulation CAA) No. 06/2020 on Conditions and Method of Use of Paragliders and Hang-Gliders.

1.1. The activity for which the permit/license is issued

The activity of this license is licensing of the paragliding flight personnel.

1.2. Validity period of the permit/license

Permanent

1.3. Payment for obtaining the permit/license

50 Euro.

1.4. Documents required for application:

1. Application [Original]
2. Instructor/Examiner Approval [Original]
3. Proof of passing the theoretical and practical exam [Original]
4. Proof of Application form [Copy]

2. Recommendations

1. This license is determined by law;
2. Apply the principle of administrative assistance and conduct of the procedure ex officio, in terms of verifying some documents held by public institutions;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. The activity of the licenses should be determined by bylaws.
6. Determine the fee for application by regulation
7. Clarify the contradiction between the term extension and the name of this license in the sense of the term “renewal”

3. Justification of recommendations

1. **This license is determined by law:** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. In this specific case, it is not just about the legal material basis, which is an obligation for the operator or a competency of the CAA, but specifically, this type of license needs to be clearly defined under the LCA. The LCA does not contain provisions for amending this permit and license, therefore this should be addressed through the amendment of Article 62 of the LCA.

2. **Apply the principle of administrative assistance and conduct of procedure ex officio in terms of verifying some documents held by public institutions.** The CAA should apply the principle of administrative assistance throughout the procedure, combining it with the principle of conducting the procedure ex officio. By applying these principles, CAA will avoid the submission of some documents and will reduce the administrative burden for application.
3. **Renewal of licenses should be done ex officio.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **The activity of the licenses should be determined by bylaws:** Pursuant to Article 17.2 of LPLS, it is recommended that when issuing special procedural regulations, for each permit and license, their activity is defined more precisely.
6. **Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.
7. **Clarify the contradiction between the term extension and the name of this license in the sense of the term “renewal”:** Regulation (CAA) no. 06/2020 on Conditions and Method of Use of Paragliders and Hang-Glider does not provide for the renewal for paragliders. Thus, the name of this license is unclear, due to the fact that it is not clear when there is a need to renew a license that is issued for a permanent term .

76. CERTIFICATION FOR HOLDING THE THEORETICAL EXAMINATION FOR UNMANNED AIRCRAFT SYSTEMS (SAP)

1. Legal basis for issuing the permit/license

This license is not determined by LCA. The provisions related to this license are defined under Regulation (CAA) No. 01/2021 on Amending and Supplementing the Regulation No. 01/2017 on Unmanned Aircraft Systems (SAP).

1.1. The activity for which the permit/license is issued

The activity of this license is registration of unmanned aircraft systems (SAP).

1.2. Validity period of the permit/license

Five (5) years.

1.3. Payment for obtaining the permit/license

10-50 Euro.

1.4. Documents required for application

1. Completed form [Original]
2. Description of the operation and the flight area [Original]
3. Type of SAP that will be used for flight operation [Original]
4. Pictures of SAP which will be used [Original]
5. Flight manual or user manual [Original]
6. Signed statement [Original]
7. Certificate of Knowledge Test (for Categories 3 and 4 of SAP)[Original]
8. Payment of the SAP registration fee [Original]

2. Recommendations

1. This license is determined by law;
2. Establish the appeals procedure in case of non-licensing;
3. Renewal of licenses should be done ex officio;
4. Establish an SPC in CAA;
5. Draft a special regulation on the procedure and criteria for issuing approvals.

3. Justification of recommendations

1. **This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law. This recommendation can be implemented by amending and supplementing the LCA.
2. **The term of the license shall be determined by regulation.** In the present case, the term was taken from the data provided by CAA. However, in the CAA regulations, no provision has been found that refers to the duration of this license. Pursuant to Article 17 of the LPLS and in order to increase legal certainty, rules that determine the duration of this license must be adopted.
3. **The renewal of licenses should be done according to the ex officio principle.** In cases where it is not possible for this license to be issued without a specified period, the renewal of this license should be done ex officio, through a verification procedure ex officio of the facts and not through a new administrative procedure for application. This can be determined by a bylaw issued by CAA. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
4. **Establish an SPC in CAA.** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.
5. **Draft a special regulation on the procedure and criteria for issuing the license.** In order to unify the application procedures for this license, the criteria for this license, the necessary documents and other review issues, in accordance with the LGAP, it is recommended to issue a special regulation on the procedure and criteria for issuing approvals. Such a regulation would help CAA to implement the principles of LGAP and LPLS in simplifying the procedures for

issuing this permit and license, as well as help the parties to be efficiently informed of the other procedures, criteria and aspects for the issuance of the approval concerned.

77. DECISION ON THE APPROVAL OF THE INCENTIVE PROGRAM

1. Legal basis for issuing the permit/license

This license is not provided for by law. The provisions related to this issue are included in the Regulation No.3/2015 on Airport Fees, namely Article 8 Modulation of airport fees. The license is not defined by law, as provided by Article 17.1 of the LPLS.

1.1. The activity for which the permit/license is issued

The activity of this license is the incentive scheme program, after the airport fee modulation has been applied.

1.2. Validity period of the permit/license:

Depending on the validity of the incentive program

1.3. Payment for obtaining the permit/license:

N/A

1.4. Documents required for application:

1. Objective of operating expenses;
2. Operating revenue projection;
3. Minutes of the meeting of the consultative committee;
4. Service Level Agreement, if applicable;
5. Investment plan and its financing.

2. Recommendations

1. This license is determined by law;
2. Determine the fee for application by regulation;
3. Establish an SPC in CAA;

3. Justification of recommendations

- 1. This license must be determined by law.** LPLS is a horizontal law, with which other laws should also be in compliance. This issue should be addressed in the LCA and relevant bylaws, and the designation should be in line with the LPLS. Furthermore, Article 17.1 of LPLS stipulates that licenses must be determined only by law.
- 2. Determine the fee for application by regulation.** In the CAA regulations regarding fees, the fee related to this license is not defined. References to fees are taken from the data provided by CAA. With the aim of increasing legal certainty, the fee amount for this service should be determined by the CAA bylaws. LPLS defines in Article 18 a proportional tax, to the extent that is necessary to cover the expenses incurred by the competent authority for administering the permit. The level of the fee should also be in accordance with this principle. Furthermore, it is necessary for the fee to be fixed and not determined through secondary elements that may allow for fee setting. Such an approach has the potential to create discrimination or legal uncertainty. CAA should therefore establish fixed fees.

3. **Establish an SPC in CAA:** A one stop shop or Single Point of Contact should be established within CAA, regarding the application and review procedures of licenses and other permits issued by CAA. This Single Point of Contact will simplify the procedure and concentrate reviewing capacities at this point. Such an approach will help applicants to efficiently initiate and conclude the procedure, and also simplify the reviewing process for the authority. Such action can be taken through bylaws, as defined in Article 17.2 of LPLS.