

Title:	Opinion and Instruction Document – Aircrew Regulation
Package Number	0157-1
Package Title	GA Pilot Licensing and Training Simplification Project (1)
Headline Purpose:	Simplify and optimise the regulations for GA pilot licensing and training (aeroplanes and helicopters).
Proposed action:	Amend UK Regulation (EU) 1178/2011 (“the Aircrew Regulation”) as proposed by the CAA GA Licensing and Training Simplification Project.

The proposed amendments listed in this Opinion and Instruction Document (OID) serve only to convey a policy recommendation by the CAA to the Secretary of State.

Any changes to regulations will be published on [legislation.gov.uk](https://www.legislation.gov.uk) and subsequently in the [Aviation Regulatory Library](#), once they have passed into law.

Policy Objective

1. Simplify and optimise the regulations governing licensing and training for General Aviation (GA) pilots.
2. Improve stakeholder understanding of the licensing system, reduce cost and deliver time saving benefits to the CAA in reduced processing effort and a reduction in related queries.
3. Following appropriate consultation, this Opinion and Instruction Document (OID) sets out the CAA’s opinion for the applicable amendments to UK Regulation (EU) 1178/2011 (“the UK Aircrew Regulation”). These proposed amendments have now been submitted to the Department for Transport (DfT) for sponsorship through the legislative process.

Background

In 2020, the CAA consulted on opportunities for regulatory reform after the UK left the system of regulation managed by the European Aviation Safety Agency (EASA). The consultation was published in [CAP 1985](#) and the Consultation Response Document (CRD) in [CAP 2146](#). A key area identified for further analysis and reform was flight crew licensing for GA pilots, giving rise to the Licensing and Training Simplification (LTS) project.

The LTS project commenced in 2021 and has developed proposals for:

- Reforming the Private Pilot Licences (PPL) for aeroplanes and helicopters that comply with International Civil Aviation Organisation (ICAO) standards;
- Reforming and consolidating the aeroplane and helicopter pilot licences that do not comply with international standards. Such ‘sub-ICAO¹’ licences are designed for flight in UK airspace only and are subject to certain limitations;
- Better integration of the syllabus for the sub-ICAO licence with that for the ICAO PPL, to allow a more proportionate progression from one to the other;
- Appropriate reforms to pilot licensing for sailplanes and balloons, including commercial passenger ballooning operations which are a significant element of UK ballooning; and
- Reviewing the requirements for the validity and maintenance of aircraft class ratings.

¹ ‘Sub-ICAO licences’ refers to those not issued in accordance with ICAO Standards and Recommended Practices and are normally limited to flight within the UK, except when permission has been given by a foreign state.

To implement the above, amendments are proposed to:

- UK Regulation (EU) 1178/2011 (“the UK Aircrew Regulation”);
- UK Regulation (EU) 2018/395 (“the UK Balloon Regulation”);
- UK Regulation (EU) 2018/1976 (“the UK Sailplane Regulation”); and
- The Air Navigation Order 2016 (“the Order”).

The CAA has prepared an OID for each of the relevant regulations. This OID addresses the first package of changes applicable to the UK Aircrew Regulation.

Not all the policy proposals developed and consulted on are included. Some proposals require further analysis and may be subject to further legislation in the future. For consultation documents and more detail on the proposals, please see <https://www.caa.co.uk/general-aviation/pilot-licences/licensing-training-simplification/>

Summary of changes

Summary of the proposed changes to the UK Aircrew Regulation, as included in the ‘Suggested Changes’ section below:

- Clarify and rationalise elements of Articles 3 and 4. Include a prohibition on issuing new Light Aircraft Pilot’s Licence (Aeroplanes) licences after 30th September 2025. The LAPL(A) is replaced by NPPL(A) as the main UK sub-ICAO aeroplane pilot licence. Existing licences issued before that date remain valid.
- Amend Article 10a to allow training towards the Sailplane Pilot Licence (SPL) to be conducted at a Gliding Club affiliated to the British Gliding Association, rather than an Approved Training Organisation (ATO) or Declared Training Organisation (DTO).
- Expand via FCL.035 the circumstances in which flight time in non-Part 21 aircraft may be counted towards licences and ratings granted under Part-FCL of the Aircrew Regulation.
- Make amendments to the LAPL(A) to align the class rating system with that for other licences under Part-FCL (this would apply to existing LAPL(A) holders).
- Make provision for ‘bridging’ theoretical knowledge exams for when the holder of a National Private Pilot Licence (Aeroplanes) (NPPL(A)) wishes to obtain a Part-FCL PPL(A).
- Provide that the holder of a Part-FCL PPL(A) with instructor rating may receive remuneration for giving instruction towards the NPPL(A) issued under the Order.
- Revise FCL.210.A – PPL(A) experience requirements and crediting to more closely align with the wording of ICAO Annex 1 and introduce appropriate flexibilities for applicants with existing flight experience in aeroplanes.
- Revise the provisions relating to revalidation in line with our policy approach and aligning existing LAPL(A) with the requirements applicable to other aeroplane licences.
- Remove the pre-course entry flight experience requirement for the Aerobatic Rating.
- Remove the sailplane towing rating.
- Provide that the holder of a single engine piston rating may fly a single engine electric aircraft, subject to appropriate differences training.
- Make more proportionate the requirements applicable to ATOs and DTOs when using non-Part 21 aircraft for training.

What legal powers are being used to achieve the change?

Changes to UK Regulation (EU) 1178/2011 will be made under powers in Articles 23, 27 and 127 of UK Regulation (EU) 2018/1139 (“the UK Basic Regulation”).

Further considerations

Following public consultation, feedback received indicates there is strong aviation community and industry support for these changes to be implemented at the earliest opportunity.

Failure to implement changes will result in continued complexity, and a consequential burden on the aviation community, the CAA's Shared Services Centre and other policy officials involved in this area.

Affected Law (and, if Applicable, UK AMC)

<p>What is the existing UK legal framework which is relevant here?</p>	<p>UK Regulation (EU) 1178/2011:</p> <ul style="list-style-type: none"> • Article 3 • Article 4 • Article 10a • FCL.035 • FCL.105.A • FCL.135.A • FCL.140.A • FCL.205.A • FCL.210.A • FCL.700 • FCL.710 • FCL.740.A • FCL.800 • FCL.805 • Appendix 1 to Part-FCL • ORA.ATO.135 • DTO.GEN.110 • DTO.GEN.240
<p>Are any consequential amendments needed to other pieces of law?</p>	<p>See other OIDs related to this project.</p>
<p>If the change proposed is to assimilated EU Implementing Rules made under the UK Basic Regulation is there any UK Acceptable means of compliance (AMC), Guidance Material (GM) Certification Specification CS that will be changed/newly adopted as a consequence if the law is changed as proposed?</p>	<p>Provisions potentially requiring new/revised AMC:</p> <ul style="list-style-type: none"> • FCL.035 • FCL.210 (AMC1) • FCL.215 • FCL.210.A • FCL.710 • FCL.740.A/FCL.140.A • ORA.ATO.135 • DTO.GEN.240 <p>The CAA will develop and consult separately on the AMC.</p>
<p>If the change is to ANO will the CAA be amending any CAA Policy documents?</p>	<p>Please see OID 157-4 for details of CAA policy documents to be created or amended.</p>
<p>Does this proposal relate to an international treaty obligation (e.g. an ICAO SARP)?</p>	<p>Changes retain compliance with ICAO Annex 1 (Personnel Licensing) where appropriate. There are no deadlines associated with such treaty obligations and no new ICAO differences are proposed to be filed.</p>
<p>Is a consultation required?</p>	<p>https://www.caa.co.uk/general-aviation/pilot-licences/licensing-training-simplification/</p>

	General Aviation Pilot Licensing Review Phase 2: Aeroplanes - Civil Aviation Authority - Citizen Space See above link for consultation details – there have been two consultations, one thematic in 2022 and a second during April/May 2024 with more detailed proposals.
Does the Proposal have an impact on Other Government Departments	No
Is an Impact Assessment necessary?	Impact anticipated to be less than £10m. De-Minimis Options Assessment and De-Minimis Impact Assessment will be prepared by CAA.
When is it intended that these provisions should be brought into force?	1 st October 2025.
Has an SI “slot” been identified?	Yes. June 2025
Will there be any criminal offences?	We do not believe any new criminal offences are required since requirements (and associated offences) for pilots to be in possession of an appropriate licence (or comply with an exception) are already contained in Schedule 13 of the Order.
If so, is a Justice Impact Test required?	No
What is the intended extent of the provision?	Pilots flying UK registered aircraft, pilots holding licenses issued by the UK CAA.
Are there any devolved issues?	No
Are any transitional provisions needed? If so, what are they?	No transitional provisions required. It is proposed that one element of the amendment to FCL.140.A should not apply until September 2026, however this date will be identified directly in the amended provision.

Suggested Changes to Law

The substance of the amendments detailed below have already been the subject of consultation. These proposals are therefore published for information purposes only. The amendments set out in this section constitute only the CAA’s opinion on possible amendments to the relevant legislation. While it is anticipated that any amendments enacted will broadly reflect the CAA’s proposals, all amendments to legislation are subject to a drafting process by Government. The proposals may therefore not be the final wording of UK law.

Abbreviations used below	
Abbreviation or Term	Meaning
ATO	Approved Training Organisation, described in Annex VII of the UK Aircrew Regulation
BPL	Balloon Pilot's Licence, issued in accordance with UK Regulation (EU) 2018/395 ("the Balloon Regulation")
CPL	Commercial Pilot's Licence
DTO	Declared Training Organisation, described in Annex VIII (Part-DTO) of the UK Aircrew Regulation
IMC rating	Instrument Meteorological Conditions rating, issued in accordance with the Air Navigation Order 2016 ("the Order")
IR(R)	Instrument Rating (Restricted), issued in accordance with Article 4 of the UK Aircrew Regulation
LAPL	Light Aircraft Pilot's Licence
NPPL	National Private Pilot's Licence, issued in accordance with the Air Navigation Order 2016
Part-FCL	Annex I of the UK Aircrew Regulation, containing requirements for Flight Crew Licensing
SEP rating	Single Engine Piston rating
SPL	Sailplane Pilot Licence, issued in accordance with UK Regulation (EU) 2018/1976 (the "Sailplane Regulation")
SLMG	Self-Launching Motor Glider
SSEA	Simple Single Engine Aeroplane, as defined in Schedule 1 of the Order
TMG	Touring Motor Glider
Part 21 aircraft	Aircraft subject to regulation under UK Regulation (EU) 2018/1139 ("the UK Basic Regulation") and other implementing rules contained in the assimilated law
Non-Part 21 aircraft	Aircraft described in Annex I to UK Regulation (EU) 2018/1139, or subject to a decision by the CAA in accordance with Article 2(8) of that Regulation – i.e. subject to the Order due to being 'opted out' of the Basic Regulation

Aircrew Regulation amendments – package 1

Draft amendment key:

- ~~Strikeout~~: We propose to delete text
- Red underline: Proposed new text

157-1-1: Article 3 Pilot licensing and medical certification

Background—

1. The CAA considers that Article 3 should be clarified, to make it clear that provided paragraph 3 is complied with, there is no restriction on the use of non-aircraft ratings. This would remove any ambiguity in interpretation arising from the wording of sub-paragraph 3(4) of Article 3.
2. As a result of adopting 'option 1' in the consultation regarding the sub-ICAO licence, we wish to cease issuing the LAPL(A) under the Aircrew Regulation. This is to consolidate the revised sub-ICAO licence using the NPPL provisions in the Order – since the sub-ICAO licence must include the option of a microlight aeroplane class rating (microlights are non-Part 21 aircraft), it is preferable to use the Order for the sub-ICAO licence. Holders of the NPPL(A) with an SEP rating would be permitted to fly Part 21 aircraft via the existing provisions of Article 3, paras 2, 3 and 4. Article 3 would be a logical place to provide that the CAA no longer issues the LAPL(A) under the Aircrew Regulation. We propose to retain the LAPL(A) provisions, such that existing licence holders are provided for.

Policy intention—

1. If necessary, we wish to make it clear that holders of licences issued under the Air Navigation Order, as described in paras 2,3 and 4, can also exercise the privileges of other ratings on the licence when flying Part 21 aircraft, provided they are also exercising and flying within the privileges of an aircraft rating described in 3(b).
2. Remove the reference to FCL.105.A(a) in paragraph 4.
3. Provide that after a date to be determined (this would be the date on which the changes to the NPPL(A) come into force, which is dependent on the timeline of the Order) the CAA will not issue any new LAPL(A) licences.

Draft amendments—

Article 3 Pilot licensing and medical certification

1. Without prejudice to Article 8 of this Regulation, pilots of aircraft referred to in Article 4(1)(b) and (c) and Article 4(5) of Regulation (EC) No 216/2008 shall comply with the technical requirements and administrative procedures laid down in Annex I and Annex IV to this Regulation.
2. Notwithstanding the privileges of the holders of licences as defined in Annex I to this Regulation, holders of pilot licences issued in accordance with Subpart B or C of Annex I to this Regulation or of pilot licences issued in accordance with article 152 of the Air Navigation Order 2016 and which are deemed to comply with this Regulation in accordance with Article 3(3) of this Regulation may carry out flights referred to in Article 6(4a) of Regulation (EU) No 965/2012. This is without prejudice to compliance with any additional requirements for the carriage of passengers or the development of commercial operations defined in Subparts B or C of Annex I to this Regulation.
3. A pilot licence issued in accordance with article 152 of the Air Navigation Order 2016 is deemed to comply with this Regulation where—
 - (a) it remains valid in accordance with that Order;
 - (b) it includes one of the following ratings: SSEA, SLMG, TMG, or SEP; and
 - (c) it is used within the privileges of those ratings on a flight conducted in accordance with Annex VII of Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council.
4. The ratings SSEA, SLMG and TMG have the meanings given in Schedule 1 to the Air Navigation Order 2016, and the rating SEP refers to a single-engine piston aeroplane ~~rating of the kind described in Annex 1, Subpart B, point FCL.105.A(a) to this Regulation.~~
5. After 30th September 2025, the CAA shall not issue the LAPL(A).

157-1-2: Article 4 Existing national pilots' licences

Background—

1. When the EASA Aircrew Regulation entered force in 2012, Article 4 was intended to provide transition between national licences and those under the EASA regime; many of those provisions have now been repealed. Paragraphs 7 and 8 preserved certain national privileges that existed prior to the EU taking legal competence for flight crew licensing – France wished to retain the privileges described in para 7, and 8 was added to allow the UK to issue a sub-ICAO instrument flying qualification onto a Part-FCL licence, effectively the Instrument Meteorological Conditions rating described in Schedule 8 of the Air Navigation Order 2016. When issued on a Part-FCL licence in accordance with paragraph 4(8), the authorisation is endorsed on the licence as 'Instrument Rating (Restricted)'. The CAA has then set out in policy that the privileges of the Instrument Rating (Restricted) are the same as the IMC rating, albeit valid for flight in Part-21 aircraft.

2. There is also some wording in Article 4 that has been superseded by the UK's departure from the EU, which it would be desirable to delete and rationalise.

Policy intention—

1. The CAA has not used the provisions of paragraph 7 and has no wish to do so in the future, so this can be deleted. Since most of the pre-EU Exit Article 4 was deleted further to the Withdrawal Act, Article 4 could now be retitled to reflect the subject of paragraph 8 only – a restricted instrument flying authorisation, such that it matches the equivalent rating in schedule 8 of the Air Navigation Order 2016.
2. Some of the more subjective provisions in paragraph 8, such as 8(a), which were originally written to justify preserving historic UK privileges after entering the EASA regime, can now be deleted. The safety of the authorisation was reviewed in April 2017 and found to be satisfactory.

Draft amendments—

Article 4 Existing national pilots' licences Authorisation for flight under instrument flight rules

~~7. The CAA may authorise student pilots who follow a LAPL training course to exercise limited privileges without supervision before they meet all the requirements necessary for the issuance of a LAPL, subject to the following conditions:~~

~~(a) the scope of the privileges shall be based on a safety risk assessment carried out by the CAA, taking into account the extent of training necessary for the intended level of pilot competence to be achieved;~~

~~(b) the privileges shall be limited to the following:~~

~~(i) the whole or part of the United Kingdom;~~

~~(ii) aircraft registered in the United Kingdom;~~

~~(iii) aeroplanes and helicopters, both as single-engine piston aircraft with a maximum take-off mass not exceeding 2000 kg, sailplanes and balloons;~~

~~(c) for training conducted under the authorisation, the holder of such an authorisation who applies for the issuance of a LAPL shall receive credits that are determined by the CAA on the basis of a recommendation from an ATO or a DTO;~~

[...]

~~(e) the CAA shall monitor the use of authorisations issued under this paragraph to ensure an acceptable level of aviation safety and take appropriate action in case of identifying an increased safety risk or any other safety concerns.~~

8. The CAA may issue an authorisation to a pilot to exercise specified limited privileges to fly aeroplanes under instrument flight rules before the pilot complies with all of the requirements necessary for the issue of an instrument rating in accordance with this Regulation, subject to the following conditions:

~~(a) the CAA shall only issue these authorisations when justified by a specific local need which cannot be met by the ratings established under this Regulation;~~

(b) the scope of the privileges granted by the authorisation shall be limited to those described for the Instrument Meteorological Conditions (IMC) rating in Schedule 8 of the Air Navigation Order 2016; based on a safety risk assessment carried out by the CAA, taking into account the extent of training necessary for the intended level of pilot competence to be achieved;

(c) the privileges of the authorisation shall be limited to the airspace of the United Kingdom or parts of it;

(d) the authorisation shall be issued to applicants having completed appropriate training with qualified instructors and demonstrated the required competencies to a qualified examiner, as determined by the CAA;

[previously deleted provisions]

(f) the CAA shall monitor the activities associated with the authorisation to ensure an acceptable level of safety and take appropriate action in case of identifying an increased risk or any safety concerns;

157-1-3: Article 10a Pilot training organisations

Background—

1. When the Aircrew Regulation was amended in 2019, Article 10a was amended to incorporate the Declared Training Organisation in Annex VIII (Part-DTO), as an alternative to Approved Training Organisations in Annex VII (Part-ORA). The scope of the training courses which could be offered by the DTO was set out in DTO.GEN.110 for aeroplanes, helicopters, sailplanes and balloons.
2. In the sailplane consultation, CAA put forward an alternative training organisation – a ‘Gliding Club’. Given that gliding clubs already have management structures in place to align with the British Gliding Associations (BGA) guidance on good governance of gliding clubs, the CAA proposal was to create another option for a training organisation. This proposal was supported by the community in the consultation, and we wish to proceed with this proposal (see the Sailplane OID for more detail).

Policy intention—

1. We wish to ensure compatibility with the proposal regarding 'Gliding Clubs' for sailplane training under the Sailplane Regulation, so it may be necessary to include a reference to this in Article 10a of the Aircrew Regulation.

*Draft amendments—***Article 10a Pilot training organisations**

1. Organisations shall, in accordance with Article 24(2) of Regulation (EU) 2018/1139, be entitled to provide training to pilots involved in the operation of aircraft referred to in points (b)(i) and (ii) of Article (2)(1) of Regulation (EU) 2018/1139 only where those organisations have been issued by the CAA with an approval confirming that they comply with the essential requirements set out in Annex IV to Regulation (EU) 2018/1139 and with the requirements of Annex VII to this Regulation.

~~However,~~ Having regard to Article 24(6) of Regulation (EU) 2018/1139, organisations having their principal place of business in the United Kingdom shall be entitled to provide the training referred to in point DTO.GEN.110 of Annex VIII to this Regulation without such approval [...] where they have made a declaration to the CAA in accordance with the requirements laid down in point DTO.GEN.115 of that Annex and, where so required pursuant to point DTO.GEN.230(c) of that Annex, the CAA has approved the training programme.

Additionally, an organisations having their principal place of business in the United Kingdom shall be entitled to provide the training referred to in point DTO.GEN.110(a)(3) of Annex VIII to this Regulation, with respects to training for Annex III (Part-SFCL) to UK Regulation (EU) No. 2018/1976, without such approval where the training organisation is a Gliding Club – which is a club affiliated to the British Gliding Association, created with the aim of promoting aerial sport and leisure aviation.

157-1-4: FCL.035 Crediting of flight time and theoretical knowledge*Background—*

1. Prior to the introduction of Regulation (EU) 2018/1139, the UK generally accepted flight time in equivalent non-EASA aircraft (for example, a non-EASA SEP aircraft would be equivalent to an EASA SEP aircraft) towards the flight experience requirements for licences, ratings and certificates under Part-FCL, although other provisions meant that in practice, acceptance of flight instruction (as opposed to flight time/experience) in non-EASA aircraft was often not possible – most non-EASA/non-Part 21 aircraft fly in accordance with a permit to fly, which carries restrictions on commercial use. However, the UK position was not universally accepted, so when drafting Regulation (EU) 2018/1139, attempts were made by EASA and member states to clarify this issue.
2. Articles 21 and 23 of Regulation (EU) 2018/1139 make provision for the acceptance of flight time in aircraft not subject to that regulation, and in 2019 amendments to Regulation (EU) 1178/2011 were made to address the circumstances in which flight time in non-EASA aircraft

could count towards requirements under Part-FCL. The amendments to Regulation (EU) 1178/2011 were quite limiting in their scope, and the CAA would like to expand the circumstances in which hours flown non-Part 21 aircraft may be credited.

Policy intention—

1. Remove the requirement set out in FCL.035 (4)(ii) regarding ATO/DTO authorisation for a non-Part 21 aircraft used for revalidation under FCL.140.A(a)(1) and point FCL.740.A(b)(1)(ii).
2. Appropriate flight time in aircraft falling within paragraphs (a), (b), (c), (d) and (g), and those subject to a decision in accordance with Article 2(8) can be counted towards flight experience requirements under Part-FCL.
3. Time in aircraft described in Annex I (e) and those subject to a decision under Article 2(8) will also be counted, but in more limited circumstances, and we do not wish to allow the use of aircraft under (e) or those subject to a decision under Article 2(8) to be used towards Part-FCL training required to be conducted under the auspices of an ATO/DTO – this will be indicated and controlled via the scope of DTO.GEN.240 / ORA.ATO.135.

Draft amendments—

FCL.035 Crediting of flight time and theoretical knowledge

(a) Crediting of flight time

(...)

- 4) Subject to paragraphs (5) and (6). All hours flown in aeroplanes or TMGs aircraft that are subject to a decision of the CAA taken in accordance with point (a) or (c) of Article 2(8) of Regulation (EU) 2018/1139 or that fall within the scope of Annex I to that Regulation shall be credited towards fulfilling the flight time requirements of point FCL.140.A(a)(1) and point FCL.740.A(b)(1)(ii) of this Annex, provided that the following conditions are met:
 - (i) the aeroplane or TMG concerned is of the same category and class as the Part-FCL aircraft in respect of which the hours flown are to be credited;
 - (ii) in case of training flights with an instructor, the aeroplane or TMG used is subject to an authorisation specified in point ORA.ATO.135 of Annex VII (Part-ORA) or point DTO.GEN.240 of Annex VIII (Part-DTO).

the hours were conducted in the same category and class as the Part-FCL aircraft in respect of which the hours flown are to be credited.

- 5) In the case of aeroplanes falling under paragraph (e) of Annex I and aeroplanes subject to a decision of the CAA taken in accordance with paragraph (a) or (c) of Article 2(8) flight time shall only be credited when conducted on aeroplanes equipped with a three-axis control system and limited to:
- (a) the 40 hours as a pilot of aeroplanes required by FCL.210.A;
 - (b) FCL.740.A(b); and
 - (c) FCL.140.A.
- 6) For the crediting of flight training required to be conducted at an DTO or ATO, the aircraft must—
- (d) Fall within the definition of either paragraphs (a), (b), (c), (d) or (g) of Annex I to Regulation (EU) 2018/1139 of that Regulation; and
 - (e) comply with DTO.GEN.240 or ORA.ATO.135, as applicable to the organisation delivering the training.

157-1-5: FCL.110 LAPL – Crediting for the same aircraft category

NOTE: this amendment is no longer considered necessary and will not be included in the amending regulations.

157-1-6: FCL.105.A LAPL(A) – Privileges and conditions

Policy intention—

1. The CAA proposes to remove the requirement to gain 10 hours flight time as PIC post licence issue before carrying passengers. Although this point is largely moot, it will benefit any LAPL(A) holders who complete their training shortly before the cessation of new LAPL(A) licences.

Draft amendments—

FCL.105.A LAPL(A) — Privileges and conditions

(a) Privileges

The privileges of the holder of an LAPL for aeroplanes are to act as PIC on single-engine piston aeroplanes-land (SEP(land)), single-engine piston aeroplanes-sea (SEP(sea)) or TMG with a maximum certificated take-off mass of 2000 kg or less, carrying a maximum of 3 passengers, such that there are always a maximum of 4 persons on board of the aircraft.

~~(b) Conditions~~

~~(1) Holders of a LAPL(A) shall carry passengers only if they have completed 10 hours of flight time as PIC on aeroplanes or TMG after the issuance of the licence.~~

~~(2) Holders of a LAPL(A) who previously held an ATPL(A), an MPL(A), a CPL(A) or a PPL(A), are exempted from the requirements laid down in point (b)(1).~~

157-1-7: FCL.135.A LAPL(A) — Extension of privileges to another class or variant of aeroplane

Policy intention—

1. The CAA proposes to align the class rating and differences training requirements between the LAPL(A) the other aeroplane licences. Currently the LAPL(A) uses 'endorsements' rather than class ratings, in contrast to all other licences under Part-FCL.

Draft amendments—

FCL.135.A LAPL(A) — Extension of privileges to another class or variant of aeroplane

(a) The privileges of ~~the an~~ LAPL(A) shall be limited to the class ratings included in the licence, and variant of aeroplanes or TMG in which the skill test was taken. This limitation may be removed when the pilot has completed in another class the requirements below:

~~(1) 3 hours of flight instruction, including:~~

- ~~(i) 10 dual take-offs and landings; and~~
- ~~(ii) 10 supervised solo take-offs and landings.~~

~~(2) a skill test to demonstrate an adequate level of practical skill in the new class. During this skill test, the applicant shall also demonstrate to the examiner an adequate level of theoretical knowledge for the other class in the following subjects:~~

- ~~(i) Operational procedures;~~
- ~~(ii) Flight performance and planning;~~
- ~~(iii) Aircraft general knowledge.~~

(b) Before exercising the privileges of the licence on an additional aircraft variant, the holder shall complete differences training or familiarisation in accordance with FCL.710. In order to extend the privileges to another variant within a class, the pilot shall either undertake differences training or do a familiarisation. The differences training shall be entered in the pilot's logbook or into an equivalent record and be signed by the instructor.

(c) Subject to (d), applicants for an additional class rating must comply with FCL.725.

~~(e) (d) Applicants for a TMG class rating the extension of privileges of the LAPL(A) to TMG who also hold an SPL in accordance with Annex III (Part-SFCL) to Commission Implementing Regulation (EU) 2018/1976, including the privileges to fly on TMGs, shall be considered to have complied with the requirements of FCL.725. receive full credits towards the requirements in paragraph (a).~~

157-1-8: FCL.140.A LAPL(A) — Recency requirements

Policy intention—

1. The CAA proposes to align the revalidation/renewal process for the LAPL(A) with that of the PPL(A). Such that after certain date, existing LAPL(A) holders will have to comply with the requirements set out below. A transitional arrangement may be desirable here, but the CAA considers that compliance by a fixed date is more straightforward.

Draft amendments—

FCL.140.A LAPL(A) — Recency requirements

- (a) After 30th September 2026, Holders of a LAPL(A) shall only exercise the privileges of a class rating included in the licence when it has been either:
- ~~(b) (i) issued or renewed in accordance with FCL.740; or~~
- ~~(c) (ii) revalidated in accordance with FCL.740.A(b). their licence only if in the last 2 years they have met any of the following conditions as pilots of aeroplanes or TMGs:~~
 - ~~(1) they have completed at least 12 hours of flight time as PIC or flying dual or solo under the supervision of an instructor, including:
 - 12 take-offs and landings;
 - refresher training of at least 1 hour of total flight time with an instructor;~~
 - ~~(2) they have passed a LAPL(A) proficiency check with an examiner. The proficiency check programme shall be based on the skill test for the LAPL(A);~~

~~(b) If holders of a LAPL(A) hold both a SEP(land) and a SEP(sea) privilege, they may comply with the requirements in point (a)(1) in either class or a combination thereof which shall be valid for both privileges. For this purpose, at least 1 hour of the required flight time and 6 out of the required 12 take-offs and landings shall be completed in each class.~~

157-1-7: FCL.215 Theoretical knowledge examination

NOTE: this amendment is no longer considered necessary and will not be included in the amending regulations. The same policy intention will be achieved via amendment to Part-FCL Appendix 1.

157-1-8: FCL.205.A PPL(A) — Privileges

Policy intention—

1. The CAA considers that amendments are necessary to ensure a PPL(A) with the appropriate instructor and/or examiner rating includes the privilege to instruct or examine towards the revised NPPL(A) under the Order.
2. The CAA considers that the wording of (b) is imprecise, so we propose amendments as per the below.

Draft amendments—

FCL.205.A PPL(A) — Privileges

(a) The privileges of the holders of a PPL(A) are to act without remuneration as PIC or co-pilots of aeroplanes or TMGs engaged in non-commercial operations and to exercise all privileges of holders of an LAPL(A).

(b) Notwithstanding the paragraph above, the holder of a PPL(A) with instructor or examiner privileges may receive remuneration for:

- (1) the provision of flight instruction for the LAPL(A) or PPL(A), and the PPL(A) and NPPL(A) issued under the Air Navigation Order 2016;
- (2) the conduct of skill tests and proficiency checks for the these licences mentioned in (1);
- (3) the training, testing and checking for the ratings or certificates that may be included in the attached to this licences mentioned in (1).

157-1-9: FCL.210.A PPL(A) — Experience requirements and crediting

Policy intention—

1. The CAA proposes to more closely align the requirements of FCL.210.A with ICAO Annex 1. This will make the qualifying experience requirements for the PPL more flexible, whilst retaining ICAO alignment and appropriate safety standards.
2. The addition of (a)(3) is to account for the deletion of (b). The CAA does not believe it necessary to have a specific upgrade course for the LAPL(A) or the NPPL issued under the Order – the applicant must comply with FCL.210 (requirement to attend an ATO or DTO) and the requirements of FCL.210.A (a).
3. Flight Instructors who do not possess CPL knowledge would not be able to instruct towards the requirements of (a)(1) or a(2), although instruction received from such instructors would count towards the 40 hour experience requirement stated in (a).

Draft amendments—

FCL.210.A PPL(A) — Experience requirements and crediting

(a) Applicants for a PPL(A) shall have completed at least ~~45~~ 40 hours of flight time ~~instruction in~~ as a pilot of aeroplanes or TMGs, appropriate to the class rating sought, 5 of which may have been completed in an FSTD, including at least:

- (1) ~~25 hours of~~ appropriate dual flight instruction; and
- (2) 10 hours of supervised solo flight time, including at least 5 hours of solo cross-country flight time with at least 1 cross-country flight of at least 270 km (150 NM), during which full stop landings at 2 aerodromes different from the aerodrome of departure shall be made.

(b) The requirement for 40 hours flight time specified in (a) may be reduced to 35 hours, if following a course at an ATO.

~~(b) Specific requirements for applicants holding an LAPL(A). Applicants for a PPL(A) holding an LAPL(A) shall have completed at least 15 hours of flight time on aeroplanes after the issue of the LAPL(A), of which at least 10 shall be flight instruction completed in a training course at a DTO or at an ATO. That training course shall include at least four hours of supervised solo flight time, including at least two hours of solo cross-country flight time with at least one cross-country flight of at least 270 km (150 NM), during which full stop landings at two aerodromes different from the aerodrome of departure shall be made.~~

157-1-10: FCL.700 Circumstances in which class or type ratings are required

Policy intention—

1. To align with LAPL(A) with the class rating system for other licences, it is necessary to amend the reference in FCL.700, such that it only refers to the LAPL(H).

Draft amendments—

FCL.700 Circumstances in which class or type ratings are required

(a) Holders of a pilot licence shall act as pilots of an aircraft only if they have a valid and appropriate class or type rating, unless any of the following applies:

- (1) if exercising the privileges of an LAPL(H);
- (2) if they take skill tests or proficiency checks for renewal of class or type ratings;
- (3) if they receive flight instruction;
- (4) if they hold a flight test rating issued in accordance with point FCL.820.

157-1-11: FCL.705 Privileges of the holder of a class or type rating

Policy intention—

1. The CAA proposes amendments to provide that the holder who has been issued with a 'Single Engine Piston' aircraft rating under FCL.700 may also fly an electrically power aircraft of similar characteristics. They would otherwise be prevented from doing so, since an electric engine does not include pistons.

Draft amendments—

FCL.705 Privileges of the holder of a class or type rating

- (a) Subject to (b), the privileges of the holder of a class or type rating are to act as pilot on the class or type of aircraft specified in the rating.
- (b) The holder of single engine piston (SEP) class rating may fly an aeroplane powered by a single centric propulsion unit of electric power or combination of electric and internal combustion power provided that:
 - 1) The power unit is operated by a single thrust control;
 - 2) A type rating for the aeroplane has not been established; and
 - 3) The holder of the licence has completed appropriate differences training specified by the CAA in accordance with FCL.710.

157-1-12: FCL.740.A Validity and renewal of class and type ratings*Policy intention—*

1. The CAA proposes to amend FCL.740.A such that some of the flight experience requirements may be completed at any time during the 24 month validity period of the rating, rather than during the 12 months preceding the expiry date. However, the CAA wishes to ensure that 6 of the 12 hours are still completed in the second half of the validity period.
2. There are also some references to the 'Basic Instrument Rating' / FCL.835 which appear to have been retained in FCL.740.A, despite FCL.835 not being adopted by the UK (the European in-force date was after 31st December 2020). The CAA considers it prudent to delete these references.

*Draft amendments—***FCL.740.A Revalidation of class and type ratings — aeroplanes**

(...)

(b) Revalidation of single-pilot single-engine class ratings.

(1) Single-engine piston aeroplane class ratings and TMG class ratings. For the revalidation of single-pilot single-engine piston aeroplane class ratings or TMG class ratings, the applicants shall:

(i) within the 3 months preceding the expiry date of the rating, pass a proficiency check in the relevant class in accordance with Appendix 9 to this Part with an examiner; or

(ii) within the validity period of the rating ~~12 months preceding the expiry date of the rating~~, complete 12 hours of flight time in the relevant class, including:

— 6 hours during the 12 months preceding the expiry date of the rating,

— 6 hours as PIC,

— 12 take-offs and 12 landings, and

— training of at least 1 hour of total flight time with a flight instructor (FI) or a class rating instructor (CRI). Applicants shall be exempted from this refresher training if they have passed a class or type rating proficiency check, skill test or assessment of competence in any other class or type of aeroplane.

(2) When applicants hold both a single-engine piston aeroplane-land class rating and a TMG rating, they may complete the requirements of (1) in either class or a combination thereof, and achieve revalidation of both ratings.

(3) Single-pilot single-engine turbo-prop aeroplanes. For revalidation of single-engine turbo-prop class ratings applicants shall pass a proficiency check on the relevant class in accordance with Appendix 9 to this Part with an examiner, within the 3 months preceding the expiry date of the rating.

(4) When applicants hold both a single-engine piston aeroplane-land class rating and a single-engine piston aeroplane-sea class rating, they may complete the requirements of (1)(ii) in either class or a combination thereof, and achieve the fulfilment of these requirements for both ratings. At least 1 hour of required PIC time and 6 of the required 12 take-offs and landings shall be completed in each class.

~~(5) The proficiency check for the revalidation of a single-pilot single-engine aeroplane class rating may be combined with the proficiency check for the revalidation of a BIR, in accordance with point FCL.835(g)(8).~~

157-1-13: FCL.800 Aerobatic rating

Policy intention—

The CAA proposes to remove the prerequisite experience requirement from the aerobatic rating.

Draft amendments—

FCL.800 Aerobatic rating

(a) Holders of a pilot licence with privileges to fly aeroplanes or TMGs shall undertake aerobatic flights only if they hold an aerobatic rating in accordance with this point.

(b) Applicants for an aerobatic rating shall have completed:

~~(1) after the issue of the licence, at least 30 hours of flight time as PIC in aeroplanes or TMGs;~~

~~(2) a training course at a DTO or at an ATO, including:~~

(i) theoretical knowledge instruction appropriate for the rating;

(ii) at least 5 hours of aerobatic instruction in aeroplanes or TMGs flown with engine power.

157-1-14: FCL.805 Sailplane towing and banner towing ratings*Policy intention—*

1. The CAA proposes to delete the sailplane towing rating but retain the banner towing rating. The CAA also considers that the words 'appropriately to aircraft' in sub-paragraph (d) appear to be redundant, and proposes their removal.

*Draft amendments—***FCL.805 Sailplane towing and Banner banner towing ratings**

(a) Holders of a pilot licence with privileges to fly aeroplanes or TMGs shall only tow ~~sailplanes or~~ banners when they hold the appropriate ~~sailplane towing or banner towing~~ rating.

~~(b)~~ Applicants for a sailplane towing rating shall have completed:

~~(1) at least 30 hours of flight time as PIC and 60 take-offs and landings in aeroplanes, if the activity is to be carried out in aeroplanes, or in TMGs, if the activity is to be carried out in TMGs, completed after the issue of the licence;~~

~~(2) a training course at a DTO or at an ATO, including:~~

~~(i) theoretical knowledge instruction on towing operations and procedures;~~

~~(ii) at least 10 instruction flights towing a sailplane, including at least 5 dual instruction flights; and~~

~~(iii) except for holders of an SPL in accordance with Annex III (Part SFCL) to Commission Implementing Regulation (EU) 2018/1976, 5 familiarisation flights in a sailplane which is launched by an aircraft.~~

~~(e)~~ (b) Applicants for a banner towing rating shall have completed:

(1) at least 100 hours of flight time and 200 take-offs and landings as PIC on aeroplanes or TMG, after the issue of the licence. At least 30 of these hours shall be in aeroplanes, if the activity is to be carried out in aeroplanes, or in TMG, if the activity is to be carried out in TMGs;

(2) a training course at a DTO or at an ATO, including:

(i) theoretical knowledge instruction on towing operations and procedures;

(ii) at least 10 instruction flights towing a banner, including at least 5 dual flights.

~~(d)~~ ~~(c)~~ The privileges of the ~~sailplane~~ and banner towing ratings shall be limited to aeroplanes or TMGs ~~appropriately to aircraft~~ on which the flight instruction was completed. For banner towing, the privileges shall be limited to the towing method used for flight instruction. The privileges shall be extended if pilots have successfully completed at least three dual training flights covering the full towing training syllabus in either aircraft and towing method ~~for banner towing~~.

~~(e)~~ ~~(d)~~ In order to exercise the privileges of the ~~sailplane~~ or banner towing ratings, the holder of the rating shall have completed a minimum of 5 tows during the last 24 months.

~~(f)~~ ~~(e)~~ When the pilot does not comply with the requirement in ~~(e)~~ ~~(d)~~, before resuming the exercise of his/her privileges, the pilot shall complete the missing tows with or under the supervision of an instructor.

~~(g)~~ ~~(f)~~ Applicants for a ~~sailplane towing~~ or banner towing rating on TMGs in accordance with this point shall receive full credit towards the requirements of paragraph (b) or ~~(c)~~, as applicable, if they hold a ~~sailplane towing~~ or banner towing rating in accordance with point SFCL.205 of Annex III (Part-SFCL) to Commission Implementing Regulation (EU) 2018/1976, as applicable, or if they have fulfilled all the requirements for the issue of that rating.

157-1-15: Appendix 1 — Crediting of theoretical knowledge

Background—

1. The CAA considers there should be a bridging requirement for the theoretical knowledge between the NPPL(A) issued under the Order and pilots obtaining a PPL(A). This can either be achieved via an amendment to Appendix 1.

Policy intention—

1. The CAA considers it desirable to establish a bridging requirement for the NPPL(A) licence towards the theoretical knowledge requirements of the PPL(A), so that the holder of the NPPL(A) does not have to complete all the exams listed in FCL.215.

Appendix 1 — Crediting of theoretical knowledge

Crediting of theoretical knowledge in the same or another category of aircraft - bridge instruction and examination requirements

1. LAPL and PPL

- 1.1. For the issue of an LAPL, the holder of an LAPL in another category of aircraft shall be fully credited towards requirements of theoretical knowledge on the common subjects established in point FCL.120(a).

1.2. For the issue of an LAPL or a PPL, holders of a PPL, CPL or ATPL in another category of aircraft shall be credited towards requirements of theoretical knowledge on the common subjects established in point FCL.215(a). This credit shall also apply to applicants for an LAPL or a PPL who hold a BPL issued in accordance with Annex III (Part-BFCL) to Regulation (EU) 2018/395 or an SPL issued in accordance with Annex III (Part-SFCL) to Implementing Regulation (EU) 2018/1976, except that the subject 'navigation' shall not be credited.

1.3. For the issue of a PPL, the holder of an LAPL in the same category of aircraft shall be fully credited towards the requirements of theoretical knowledge instruction and examination.

1.4. For the issue of a PPL(A), the holder of an NPPL(A) issued under the Air Navigation Order 2016 shall be considered to have complied with FCL.215 having passed examinations in Principles of flight, Performance, Radio Navigation, Aircraft general knowledge, Air law and operational procedures.

4.4. 1.5 By way of derogation from point 1.2, for the issue of an LAPL(A), the holder of an SPL issued in accordance with Annex III (Part-SFCL) to Commission Implementing Regulation (EU) 2018/1976 with privileges to fly TMGs shall demonstrate an adequate level of theoretical knowledge for the single-engine piston aeroplane-land class in accordance with point FCL.135.A(a)(2).

157-1-16: DTO.GEN.110 Scope of the training

Policy intention—

1. To amend this provision to reflect the removal of the Sailplane towing rating.

Draft amendments—

DTO.GEN.110 Scope of the training

(a) A DTO shall be entitled to provide the following training, provided that the DTO has submitted a declaration in accordance with point DTO.GEN.115:

(1) for aeroplanes:

- (a) theoretical knowledge instruction for LAPL(A) and PPL(A);
- (b) flight instruction for LAPL(A) and PPL(A);
- (c) training towards class rating for SEP(land), SEP(sea) and TMG;
- (d) training towards additional ratings: night, aerobatics, mountain, ~~sailplane~~ and banner towing;

157-1-17: DTO.GEN.240 / ORA.ATO.135 Training aircraft and FSTDs

Policy intention—

1. The CAA considers it desirable to make more proportionate the requirements for ATOs / DTOs using non-Part 21 aircraft. Currently the provision requires the CAA to make a safety assessment for a non-Part 21 aircraft, but the CAA considers it more appropriate to place this authority this to the head of training at the ATO / DTO.
2. The policy effect of the below would be to allow certain non-Part 21 aeroplanes and TMGs to be used by a DTO/ATO for training – (a): historic (b): experimental (EASA included this, although seems unlikely in practice it would be used), (c): amateur constructed (d): ex-military, (g): replicas of (a) or (d).

Draft amendments—

DTO.GEN.240 Training aircraft and FSTDs

- (a) A DTO shall use an adequate fleet of training aircraft or FSTDs appropriately equipped for the training course provided. ~~The fleet of aircraft shall be composed of aircraft that comply with all requirements defined in Regulation (EU) 2018/1139. Aircraft that fall under points (a), (b), (c) or (d) of Annex I to Regulation (EU) 2018/1139, may be used for training if all of the following conditions are met:~~
- ~~(1) during an evaluation process the competent authority has confirmed a level of safety comparable to the one defined by all essential requirements laid down in Annex II to Regulation (EU) 2018/1139;~~
- ~~(2) the competent authority has authorised the use of the aircraft for training in the DTO.~~
- (b) An aeroplane or TMG falling within Annex I to Regulation (EU) 2018/1139 shall only be used by a DTO if it falls within the definition of either paragraphs (a), (b), (c), (d) or (g) to that Regulation and does not fall within the definition of paragraph (e).
- (c) Aircraft referred to in (b) must be assessed by the appointed Head of Training for the DTO as being appropriate for the intended instruction, and shall either:
- 1) Hold a certificate of airworthiness issued in accordance with Annex 8 to the Chicago Convention;
 - 2) Be subject to a permission issued by the CAA in accordance with Article 42(b) of the Air Navigation Order 2016; or
 - 3) Be an aeroplane or TMG used solely for non-commercial flight training involving a registered owner or joint owner of the aircraft, a registered shareholder of a company that owns the aircraft, or the spouse or child of such a registered owner or joint owner.
- ~~(b) (d)~~ (d) A DTO shall establish and keep up-to-date a list of all aircraft, including their registration marks, used for the training it provides.

ORA.ATO.135 Training aircraft and FSTDs

(a) The ATO shall use an adequate fleet of training aircraft or FSTDs appropriately equipped for the training courses provided. ~~The fleet of aircraft shall be composed of aircraft that comply with all requirements defined in Regulation (EU) 2018/1139. Aircraft that fall under points (a), (b), (c) or (d) of Annex I to Regulation (EU) 2018/1139, may be used for training if all of the following conditions are met:~~

~~(1) during an evaluation process the CAA has confirmed a level of safety comparable to the one defined by all essential requirements laid down in Annex II to Regulation (EU) 2018/1139;~~

~~(2) the CAA has authorised the use of the aircraft for training in the ATO.~~

(b) An aeroplane or TMG falling within Annex I to Regulation (EU) 2018/1139 shall only be used by a DTO if it falls within the definition of either paragraphs (a), (b), (c), (d) or (g) to that Regulation and does not fall within the definition of paragraph (e).

(c) Aircraft referred to in (b) must be assessed by the appointed Head of Training for the ATO as being appropriate for the intended instruction, and shall either:

- 1) Hold a certificate of airworthiness issued in accordance with Annex 8 to the Chicago Convention;
- 2) Be subject to a permission issued by the CAA in accordance with Article 42(b) of the Air Navigation Order 2016; or
- 3) Be an aeroplane or TMG used solely for non-commercial flight training involving a registered owner or joint owner of the aircraft, a registered shareholder of a company that owns the aircraft, or the spouse or child of such a registered owner or joint owner.

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