UK Civil Aviation Authority

General Aviation Pilot Licensing Review

Phase 2: Detailed Proposals

Aeroplanes

A consultation

CAP 2974A

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Please reply to this consultation via our website: https://consultations.caa.co.uk by **22 May 2024**.

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The latest version of this document is available in electronic format at: www.caa.co.uk

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Summary

Introduction and how to respond

1. The CAA continued throughout 2023 with the project to simplify General Aviation (GA) flight crew licensing and training. We engaged a working group of GA community aeroplane experts to develop more detailed proposals, which are presented in this consultation paper.

2. This work follows an earlier phase 1 consultation CAP 2335 in Autumn 2022. The GA community response (summarised in CAP 2532) showed strong support for updating licensing and training requirements in several key areas.

3. The consultation closes on **22nd May 2024**. Please submit responses via our website: https://consultations.caa.co.uk.

4. The outcome of the consultation will assist the finalisation of the proposals. The relevant legal drafting will then be developed with the Department for Transport and presented for legislative amendment.

Specific proposals

ICAO PPL(A)

- Discontinue issuing the UK PPL under the Air Navigation Order (ANO) as a standalone licence. Where required, we would issue a combined Part-FCL and UK PPL licence document, allowing non-Part 21 type ratings to be added alongside Part-FCL class and type ratings.
- Reduce the qualifying experience required for the issue of a PPL from 45 hours flight instruction to 40 hours flight time, in line with ICAO Annex 1: Personnel Licensing. It is not proposed to remove any content from the existing practical syllabus.
- Maintain the content and number of questions for the theoretical knowledge exams, but consider combining topics, to reduce the number of individual papers.

Class ratings

- Revise the class rating structure to allow for emerging electric and hybrid propulsion systems.
- Possible wider simplification of the class rating system and allow more use of differences training when qualifying on different aircraft.

Sub-ICAO licences

- Consolidate the current NPPL(A) and LAPL(A), reducing the number of licences that provide similar privileges.
- More proportionate training and knowledge requirements when moving between aircraft variants and classes.
- An improved pathway from the sub-ICAO licence to the Part-FCL PPL(A).

Maintenance of competence

- Remove the requirement for flight experience when revalidating the single-engine piston (SEP) and touring motor glider (TMG) ratings.
- Possible alignment of the recency requirements between the sub-ICAO licence and the PPL(A), to create a single revalidation for SEP, TMG and microlight aircraft.

Theoretical knowledge

- Improvements to exam procedures and validity periods.

Instrument rating

- Allow sub-ICAO licence holders to obtain an IMC rating.
- Reforms to the theoretical knowledge requirements for the Competency-Based Modular training course for the Instrument Rating.
- Allow the Competency-Based Modular training course for the Instrument Rating to be undertaken at a Declared Training Organisation (DTO).
- Require the IMC/IR(R) rating to be conducted at a DTO or Approved Training Organisation (ATO).

Other issues

- Consideration of the theoretical knowledge requirements for Flight Instructors.
- Aerobatic rating – potentially align the requirement for a rating between the ANO and Part-FCL.
- Tow Rating – potentially align the requirement for a rating between the ANO and Part-FCL.
- Review the circumstances under which non-Part 21 aircraft may be used for training.
- Proposed acceptable means of compliance (AMC) for training in partial power failures.

Chapter 1

Background, scope and approach

1.1 The CAA continued throughout 2023 with the project to simplify General Aviation (GA) flight crew licensing and training. This paper consults on the detailed proposals for aeroplanes. Similar consultations are being undertaken for balloons and airships, sailplanes, helicopters and gyroplanes.

1.2 This work follows the earlier consultation CAP 2335 in Autumn 2022. The 1,246 GA community responses[1] (summarised in CAP 2532) showed strong support in several key areas for updating our current legislation with regards to licensing and training.

1.3 The second consultation explores these areas in more detail, ensuring that we achieve the aims of the project and community, whilst maintaining safety and ICAO compliance where appropriate. It reflects work undertaken in collaboration with a working group of GA community aeroplane experts.

1.4 The working group was tasked to consider a list of topics and make recommendations on the details. Post the first consultation, the group met seven times and considered various written submissions from members. The CAA chaired these discussions and developed papers summarising the recommendations. These papers formed the basis of this second consultation.

Scope

1.5 The scope of the project is regulated recreational GA in the UK. Specifically non-commercial operations involving other-than-complex aeroplanes and helicopters.[2] This includes the following categories of aircraft and operations:

- Private flying;
- Flight training activities for licences and ratings for private pilots; and
- Non-commercial aerial work activities such as sailplane towing.

1.6 The scope includes licences, ratings and certificates to act as pilot in command of aeroplanes, as defined by UK Part-FCL (flight crew licensing requirements within the assimilated UK Aircrew Regulation (EU) No 1178/2011[3]) as 'engine-

[1] See Consultation Response Document CAP2532 which set out its detailed findings. For more information on this project, see our dedicated project microsite on the CAA website: https://www.caa.co.uk/general-aviation/pilot-licences/licensing-training-simplification/

[2] Complex aircraft as defined in EASA Basic Regulation 216/2008, article 3(j).

[3] All UK regulations can be found on the CAA website: https://www.caa.co.uk/uk-regulations/

driven fixed-wing aircraft heavier than air which is supported in flight by the dynamic reaction of the air against its wings'.

1.7 The aeroplane workstream excludes powered sailplanes, as defined in UK Regulation (EU) No 2018/1976, Art.2(3) as 'a sailplane equipped with one or more engines having, with engine(s) inoperative, the characteristics of a sailplane'.

1.8 This project does not cover the following areas:

- Commercial operations other than private pilot instruction;
- Complex aeroplanes and helicopters[4];
- Ratings and rating exemptions for historic/ex-military aircraft, as well as display pilot qualifications; or
- Unregulated activities such as non-Part 21 gliders and self-propelled hang gliders (also known as 'paramotors' or 'powered paragliders').

1.9 It is unlikely that the assimilated law (previously known as retained EU law) and the Air Navigation Order 2016 (ANO 2016) will be consolidated during the timeline of this project. A combination of changes to the assimilated law and ANO 2016 will be necessary to implement the proposals.

Our approach to this consultation

1.10 The outcome of the consultation will assist the finalisation of the proposals. The relevant legal drafting will then be developed with the Department for Transport and presented for legislative amendment.

1.11 The consultation chapters address the following:

- ICAO Private Pilot Licence
- Class ratings and variant groups
- Sub-ICAO aeroplane licence
- Maintenance of competence
- Theoretical knowledge requirements
- Instrument ratings
- Other issues identified

1.12 For each topic we outline the current situation and issues arising, proposals and associated rationale. For some proposals, we set out example amendments to

[4] Complex aircraft as defined in EASA Basic Regulation 216/2008, article 3(j).

the regulations as they might look in UK Part-FCL. However, these are indicative and final legal text may differ.

1.13 Where indicative legal text is provided, deletions are indicated by ~~strikeout~~ and additions by red underline.

1.14 Most questions in this consultation provide a list of possible answers, and some will provide space to comment. Regarding the possible answers, the format normally used is 'yes', 'no', 'undecided' and 'no view/don't know'. In relation to the latter two options, the 'undecided' option is for respondents who are familiar with the subject matter but have not firmly settled in support or otherwise. Whereas respondents unfamiliar with the subject or have no view would select the 'no view/don't know' choice.

1.15 The consultation closes on **22nd May 2024**. Please submit responses via our website: https://consultations.caa.co.uk.

About you

In accordance with our public law obligations, we welcome and will equally weight all submissions to this consultation. However, to help us better understand the results of any technical questions, we would like to know if you participate in aviation and in what capacity (select all that apply to you):

- GA aeroplane flight crew licence holder or student: PPL(A), NPPL(A), LAPL(A)
- GA aeroplane instructor or examiner
- Other GA aircraft flight crew licence holder or student eg PPL(BA), PPL(H), BPL, SPL etc
- Other aviation flight crew licence holder including eg CPL(A), ATPL, military
- Other aviation licence holder, eg other aircrew, air traffic controller, aircraft maintenance etc
- Aircraft operator or training organisation management
- GA-related industry, eg insurance, manufacturer, distributor. Please specify:

  _____
- Position within a government, regulatory or related body
- Position within an aviation representative or professional body
- Frequent passenger in a GA aircraft
- None of the above, but I consider myself affected by GA licensing; eg local resident, etc
- None of the above: I do not participate in this part of aviation, but have an interest in these issues

Is your response the formal submission of an organisation?

- No
- Yes: organisation: _____

In most cases, we would expect only one submission per organisation.

Chapter 2

ICAO PPL(Aeroplanes)

Combined licence document

2.1 The Phase 1 consultation proposed discontinuing the issue of the UK PPL under the Air Navigation Order 2016 (ANO 2016). Whilst most licences are issued under UK Part-FCL, there is also a limited number of UK licences issued under the ANO 2016, mostly to existing Part-FCL licence holders. A common reason for this is the endorsement of a type rating for a non-Part 21 aircraft.

2.2 We will investigate adding non-Part 21 type ratings to a Part-FCL licence, using a licence document with a dual legal basis under the Aircrew Regulation and ANO. If possible, we would therefore discontinue the issue of the ANO PPL (or higher licences) as a standalone licence document.

2.3 Existing ANO licence holders would be unaffected; we are not proposing to remove the licence for existing holders. Holders of UK licences may apply for a Part-FCL equivalent, subject to having a current rating and medical – on application we would issue a licence in the new combined format.

> Question
>
> Do you agree with our proposal to discontinue issuing new UK PPL (and higher) licences under the Air Navigation Order?
>
> Yes No Undecided No view/don't know

Qualifying experience

2.4 The outcome of the Phase 1 consultation committed us to reassessing any Part-FCL requirements for the PPL(A) that are not reflected in ICAO Annex 1: Personnel Licensing:

Phase 1 Consultation Outcome – CAA Decision no.3

We will proceed in Phase 2 with the reassessment of the UK Part-FCL PPL(A) requirements that go beyond those set out in ICAO SARPs Annex 1 Personnel Licensing, with respect to safety standards.

2.5 The aeroplane project working group reviewed the qualifying experience requirements for the PPL(A) and suggested adding a provision reflecting the ICAO Annex 1 option for a 35-hour PPL, if following an approved course of training.

2.6 Whilst in practice it is unlikely many PPL students would complete the syllabus in 35 hours, an Approved Training Organisation (ATO) would be able to offer this option, in cooperation with their allocated CAA inspector. It may benefit students who are training intensively and therefore more likely to complete the course with lower hours.

> Question
>
> Do you agree with including a 35-hour PPL option for students training at an ATO under an approved course of training?
>
> Yes No Undecided No view/don't know

2.7 The group also suggested that point (a) of FCL.210.A (PPL(A) – experience requirements and crediting) may be amended as follows:

(a) Applicants for a PPL(A) shall have completed at least 40 ~~45~~ hours of flight time ~~instruction~~ in 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.

2.8 We are not proposing to change the existing practical syllabus, but the reduction in qualifying experience to 40 hours (or 35 on an approved course) may allow some PPL students to progress through the course with reduced flight hours.

2.9 The proposal to change the minimum experience from 'flight instruction' to 'flight time' is to allow greater flexibility in meeting the requirements for licence issue; for example, cases in which applicants have completed appropriate flight time in aeroplanes towards the sub-ICAO licence, or other aeroplane training outside the Part-FCL regime. The removal of a specific dual instruction hours requirement also reflects ICAO Annex 1.

2.10 FCL.210.A (a)(2) already reflects ICAO Annex 1, so we do not propose to change the requirements relating to supervised solo time or cross country flying.

2.11 FCL.210.A (b), (c) and (d) address the crediting towards the PPL(A) for holders of the LAPL(A), sailplane licence (SPL) and licences in other aircraft categories.

2.12 We will review the existing requirements to ensure they deliver flexibility for applicants, whilst maintaining appropriate standards. Changes required for the recognition of experience gained on the sub-ICAO licence would be captured here.

Question

Do you agree with our proposed changes to FCL.210.A(a) regarding the qualifying experience requirements for issue of a PPL(A)?

Yes No Undecided No view/don't know

Do you have any comments on this?

2.13 The working group also considered acceptance of flight time gained in microlight aeroplanes.

Question

What changes should we consider for experience crediting towards the PPL(A) from other licences, as set out in FCL.210 (b), (c) and (d)?

Answer:_____

Question

Where a PPL(A) student has previous microlight aeroplane flight time, should this count towards the PPL(A) qualifying experience?

Yes No Undecided No view/don't know

Do you have any comments, including under what circumstances this should be counted?

Theoretical knowledge

Number of exams

2.14 Currently there are nine separate exams for the PPL(A), one for each subject identified in ICAO Annex 1 and FCL.215. These exams consist of five common papers and four that are specific to the aircraft category.

2.15 It is not mandated in regulation that each subject has a separate exam, and some EASA states combine subjects. The working group identified arguments for both approaches.

2.16 Some members advocated that having a higher number of specific exams made revision easier and that candidates can already combine exams if they so wished. Having multiple exams may also support the parallel integration of theoretical knowledge and flight training.

2.17 Others in the group believed that multiple exams made the theoretical knowledge course seem more onerous and that reduced exams would provide more motivation for candidates.

2.18 We propose to keep the overall number of exam questions for the PPL(A) to 120, in line with existing AMC material for the PPL. However, we are open minded on the number of individual papers the questions should be distributed within.

2.19 The working group identified options that included reducing the number of exams to either seven or two. With seven exams, Air Law would be merged with Operational Procedures and elements of Flight Performance and Planning would be merged with Navigation and Aircraft General Knowledge.

2.20 In the case of two exams, all the aircraft category specific subjects would be merged into one paper and the common subjects into another.

2.21 We appreciate that this may end the widespread practice of training organisations requiring student pilots to pass the air law examination before their first solo flight, and the navigation, flight performance and planning examinations before their first solo cross-country flight.

Question

Which approach would you support to the theoretical knowledge exams?

- Combine exams into seven
- Combine exams into two
- No change to existing requirements
- Undecided
- No view/don’t know

Chapter 3

Class ratings and variant groups

3.1 The system of class and type ratings links the complexity of an aircraft with the skill and capabilities required of the pilot.

3.2 Within the UK requirements (assimilated from the EASA system[5]), some elements of the class and type rating system are more complex and granular than the relevant ICAO standards.

Current regulations

3.3 Currently the UK Part-FCL regulations contain the single-engine piston (SEP) class rating, which may be added to a PPL(A) as either an SEP (land) or SEP (sea) rating.

3.4 A separate single-engine turboprop (SET) class rating may also be obtained, although the privileges for many SET aircraft are type-specific and must be revalidated separately. Class ratings are also available for multi-engine piston (MEP) land and sea. There is very limited use of multi-engine turboprop (MET) class ratings, as most multi-engine turboprops require a type rating.

3.5 Classes, types and the requirements for differences or familiarisation training are set out in the CAA Class and Type Ratings and Endorsements List[6] and given effect via FCL.700 and AMC1 FCL.700.

3.6 For the single-engine piston class ratings, the variant groups are normally added via differences training. Multi-engine class ratings do not have such variant groups, as differences training is required between every type within the class.

3.7 Pilots holding an SEP class rating and wishing to progress to an aircraft requiring another class or type rating, must comply with FCL.725 and undergo a skills test and theoretical knowledge examination, depending on the nature of the rating:

a) Multi-engine aircraft, the theoretical knowledge examination shall be written, and the number of multiple-choice questions shall depend on the complexity of the aircraft.

b) For single-engine aircraft, the theoretical knowledge examination shall be conducted verbally by the examiner during the skill test to determine whether a satisfactory level of knowledge has been achieved.

[5] Hereafter we will refer to the system that the UK assimilated from the EASA regulations as ‘the UK/EASA system’.

[6] UK class and type rating lists | Civil Aviation Authority (caa.co.uk)

c) For single-pilot aeroplanes that are classified as high-performance aeroplanes, the examination shall be written and comprise at least 100 multiple-choice questions, distributed appropriately across the subjects of the syllabus.

d) For single-engine and multi-engine aeroplanes (sea): written examination comprising at least 30 multiple-choice questions.

3.8 Upon successful completion of this assessment of competence, the applicant must then apply to us for the addition of a rating and pay the requisite fee.

Issues

3.9 The current UK/EASA system should be updated to reflect emerging technology propulsion systems. We are already seeing the introduction into GA fleets of single-engine electric and piston/electric hybrid technology.

3.10 ICAO Annex 1, paragraph 2.1.3.1 indicates that class ratings shall be established for single-engine (land), single-engine (sea), multi-engine (land) and multi-engine (sea). However, the UK/EASA system goes beyond the ICAO standard by applying classes linked to propulsion system – this has the effect of imposing further barriers, which may exceed what is necessary to achieve an appropriate level of safety.

3.11 The UK/EASA system also requires differences training for every type of multi-engine piston aeroplane. This does not account for the diverse range of aircraft within the GA fleet, many of which have similar handling and operational characteristics. It also potentially causes difficulties with rarer types, where there may be a lack of qualified instructors to deliver the training.

3.12 Whilst training is appropriate in many circumstances, the propulsion type distinctions in the existing rating system may be disproportionate when considering the actual handling and operational characteristics.

3.13 Other jurisdictions operate a class rating system free of propulsion system distinction, in line with ICAO standards. ICAO specifies class ratings, and that type ratings must be applied for multicrew aircraft; but beyond that, the requirements are at the discretion of the state.

3.14 In the USA, type ratings are only required for aeroplanes above 5,670 kg MTOW, or when turbojet powered. Additional training requirements are sometimes applied to aircraft below this threshold if operational experience or type evaluation indicates a necessity.

Proposals

3.15 We have explored several approaches aimed at reducing the amount of testing and administration when moving between types, without potentially downgrading safety:

- Expanding the SEP rating to also include electric and piston-electric hybrid technology; and
- Exploring wider reforms to the class ratings system to simplify multi-engine class ratings and incorporate single/multi-engine turboprop platforms.

Expand SEP rating to include electric and hybrid technology

3.16 We are considering incorporating pure electric and electric (non-turbine) hybrid technology into the SEP rating. We see this as an important reform given the impending electrification of the GA fleet.

3.17 We believe it is necessary to capture in the regulations the need for adequate differences training to ensure that pilots are aware of the unique aspects of operating electric power plants as well as their performance limitations.

3.18 One option is to replicate the EASA approach, as published in a recent Opinion.[7] They examined the same issue and appear to have settled on revising the definition of 'SEP' (in the Aircrew Regulation) for the purposes of flight crew licensing to include both electric and piston-electric hybrid:

(8a) "SEP aeroplane" means a single-engine, single-pilot aeroplane for which no type rating is required and whose single centric propulsion unit is operated by a single thrust control and driven by either of the following types of engine:

(a) a piston engine;

(b) an electric engine system which, if so specified following the certification process in accordance with Commission Regulation (EU) No 748/2012, may consist of more than one electric engine;

(c) if so specified following the certification process in accordance with Commission Regulation (EU) No 748/2012, a hybrid engine system that consists of piston and electric engines.

3.19 We propose a difference from the EASA approach regarding sub-paragraph (c) and piston-electric hybrid technology. Our belief is that we should not limit this class to piston engine as the only hybrid solution, given the possibility that other

[7] EASA Opinion 05/2023, Rulemaking Task RMT.0678 'Simpler, lighter, better flight crew licensing requirements for General Aviation'. See Annex to Opinion 05/2023, p.3, Article 1.

non-turbine power sources are being explored by the industry, and we want to make this reform as enduring as possible.

3.20 Instead, it would allow us to introduce one or more new variant groups within the class: pure electric and/or non-turbine hybrid electric, and we could also set out details of the differences training requirements in Acceptable Means of Compliance or Guidance Material.

Table 3.1 – Proposed integration of single-engine electric and hybrid electric aircraft

	Existing	**Proposed**
Class ratings or class ratings description	Single-Engine Piston (Land)/(Sea)	Single-Engine Non-Turboprop (Land)/(Sea)
Variant groups (Requiring differences training)	• Variable pitch propellers • Retractable landing gear • Turbo/super charged engine(s) • Cabin pressurisation • Tailwheel • EFIS • Single-Lever Power Control	• Variable pitch propellers • Pure electric propulsion • Hybrid electric propulsion • Retractable landing gear • Turbocharged piston engine(s) • Cabin pressurisation • Tailwheel • EFIS • Single-Lever Power Control

3.21 This approach provides a cost-effective approach to addressing the single-engine electric/hybrid technology issue, without interfering with the currently established class rating structure.

3.22 However, we are aware that this approach does not address other possible simplifications. It only applies to single-engine non-turboprop aeroplanes and does not include aircraft that currently fall within the MEP or SET class ratings.

Question

Do you agree with revising the SEP class rating to incorporate pure electric and non-turbine hybrid-electric power plants, and introducing new variant groups to the class requiring differences training, covering pure-electric and hybrid-electric propulsion systems?

- Yes, I support this option as described above, with pure-electric and non-turbine hybrid introduced as variant groups requiring formal differences training.
- Yes, I support this option, but we should limit hybrid technology to piston-electric only, as EASA have done.
- No, I don't think we should alter the current system of class ratings at this time.
- Undecided
- No view/don't know

Applying the variant groups from the SEP to the MEP class

3.23 Currently MEP pilots must undertake differences training for every MEP type. It may be possible to maintain an acceptable level of safety by applying the variant groups from the SEP rating to the MEP rating as well, thus removing the need for differences training for every type.

Question

Do you agree with applying the variant groups from the SEP class rating to the MEP class rating, thus removing the need for differences training between every multi-engine type?

- Yes, I support this approach.
- No, I don't think we should alter the treatment of multi-engine class ratings.
- Undecided
- No view/don't know

Wider reform to the class rating system

3.24 We had suggestions within the working group to simplify the wider system of class ratings for GA aircraft, potentially aligning closer to the minimum ICAO requirements. This included:

- Extending the electric/hybrid technology approach described earlier into the MEP class;

- Further simplifying the single-engine rating, to include turboprop platforms that do not require a type rating, as well as electric and hybrid power. This would create Single-Engine (Land) and Single-Engine (Sea) ratings; and
- As above, but also applying the approach to multi-engine aircraft by creating Multi-Engine (Land) and Multi-Engine (Sea) ratings.

3.25 These reforms would do much to simplify the current system of class ratings but would not affect aircraft currently subject to a type rating.

3.26 It was argued in the working group that revising the established system of class ratings could create complexities with flight training towards the commercial pilot licence (CPL) and airline transport pilot licence (ATPL), which is out of scope of this project. We disagree that this could be an issue, since most courses use SEP and MEP aircraft, before trainee airline pilots progress to jet types, whereas SET aeroplanes for example are a relatively niche activity in the non-commercial or charter market.

3.27 Removing reference to ‘piston’ in the SEP or MEP class ratings would also open the question of whether the default training for the rating should be designed for a piston propulsion system, or whether this assumption is removed from the training syllabus.

3.28 Some members of the working group expressed that moving to single-engine and multi-engine class ratings that incorporate turbine aircraft might be a step too far. There may be concerns about removing examiner intervention when progressing to turboprop aircraft, although this would likely still require differences training.

3.29 These issues would require us to look more carefully at the safety implications of such simplification of the class ratings system, which we could undertake as a subsequent phase of the project. Therefore, at this stage we would like to gauge the appetite for such reforms before we explore these changes in further detail and potentially present our findings in a future consultation.

Question

Do you agree that we should look further at the system of aeroplane class ratings, with a view to simplifying the single and multi-engine class ratings and potentially removing the whole reference to propulsion type from the class rating?

Yes No Undecided No view/don't know

Question

If you do agree that we should look further into the class rating system, which one of the following statements best describes your view?

- I support extending the electric/hybrid technology to multi-engine, but any further changes would be inappropriate at this time.
- I think extending electric/hybrid technology to multi-engine would not go far enough. We should explore removing reference to the propulsion systems and any safety concerns could be mitigated.

Question

Do you have any comments about the class rating system, including any further thoughts on the above choices, or suggestions for alternative approaches?

Chapter 4

Sub-ICAO aeroplane licence

4.1 'Sub-ICAO' refers to a pilot licence not issued in accordance with ICAO requirements and therefore not automatically accepted for flight outside the UK.

4.2 The first consultation proposed a single sub-ICAO licence for aeroplanes up to 2,000 kg MTOW, which would replace the existing NPPL(A) and LAPL(A). This proposal received support from consultees. It committed us to:

Phase 1 Consultation Outcome – CAA Decision no.4

We will proceed in Phase 2 with the details around consolidating the existing LAPL(A) and NPPL(A) including that licence's different class rating combinations in favour of a single sub-ICAO private pilot aeroplane licence, tentatively entitled the Private Pilot Licence (Light) (Aeroplanes) or PPL(L)(A), and then consolidating the syllabus with the ICAO PPL(A).

4.3 The single sub-ICAO licence forms Option 1 in this chapter.

4.4 Consolidation between the Air Navigation Order 2016 (ANO 2016) and the assimilated EU law is unlikely to take place within the timeline of this project. The NPPL resides within the ANO and the LAPL within UK Regulation (EU) 1178/2011 (the Aircrew Regulation); so implementation of Option 1 would require a combination amendment of the two legal structures.

4.5 An alternative proposal that would maintain the NPPL(A) for microlights, alongside the LAPL(A), was also discussed in the working group – this is outlined as Option 2.

Option 1 – single sub-ICAO licence

4.6 The licence would include privileges on aeroplanes up to an MTOW of 2000 kg, and with no more than four people onboard the aircraft.

4.7 Elements of both the existing microlight training framework and the Part-FCL LAPL(A) would be combined. There would be proportionate requirements for obtaining different privileges within the scope of the licence.

4.8 The minimum flight training hours would either be 25 hours as per the existing NPPL(A) obtained on microlights, or 30 hours as per the LAPL(A). There would be no additional experience requirements before being permitted to carry passengers.

4.9 For the flight training syllabus, our preference is to consolidate as much as possible the existing syllabi within the NPPL(A) and LAPL(A), whilst still taking account of different aircraft classes and variants. This revised syllabus would be developed as further work prior to implementation of the revised licence.

4.10 It would also be possible to obtain the sub-ICAO licence after completion of the PPL(A) syllabus. This would be relevant if the applicant wished to obtain a PPL in the future but might be unable to meet the class 2 medical standard at the point of application.

> Question
>
> Do you agree with our approach to the flight training syllabus for the sub-ICAO licence?
>
> Yes No Undecided No view/don't know
>
> Please provide any comments you may have.

Classes and variants

4.11 The licence would use the concept of classes and variants, similar to the existing LAPL(A). The proposed classes within the new licence would be:

- Microlight
- Single engine piston (SEP)
- Touring motor glider (TMG)

4.12 Within the microlight class there would be differences training requirements, as is currently the case. The SEP class would include microlight privileges, subject to differences training. Chapter 3 discussed the scope of the SEP class rating – any changes, such as removing 'piston' in the title, would also be applied to the sub-ICAO licence.

4.13 It may be appropriate for some privileges to require a skills test with an examiner, for example between SEP and TMG. However, differences training with an instructor may be acceptable throughout.

> Question
>
> Do you support a skills test or differences training when moving between class privileges within the sub-ICAO licence?
>
> - Differences training
> - Skills test
> - Undecided
> - No view/don't know
>
> Please add any comments you may have.

Revalidation

4.14 Revalidation would be a simple requirement fulfilled over a 24-month period, in any aircraft within the scope of the licence that the pilot was qualified to fly. The requirement would consist of either refresher training or flight experience combined with refresher training.

4.15 We are also considering whether the validity period should be fixed, with a defined expiry date, or a rolling system whereby the holder must have met the requirements in the 24 months preceding the date of a given flight.

4.16 The working group were split on rolling versus fixed validity. Rolling validity removes the requirement for the certificate of revalidation to be signed by an examiner, however it also means 'counting back' through the months, rather than referencing an entry on the licence document.

4.17 Rolling validity may be more advantageous if the flight experience requirement is removed from the revalidation process, since it would only be necessary to remember the date of the refresher training flight. Please see Chapter 5 for further discussion.

> Question
>
> Do you support a fixed or rolling validity period for the privileges of the sub-ICAO licence?
>
> - Fixed
> - Rolling experience and refresher training
> - Rolling refresher training only
> - Undecided
> - No view/don't know

Theoretical knowledge

4.18 Theoretical knowledge requirements would be based on the existing microlight syllabus for the NPPL(A). Proposed changes to examination rules and regulations are discussed in Chapter 6.

4.19 The theoretical knowledge syllabus currently used for the NPPL(A) with microlight class rating was revised in 2019 to take account of the increased possible MTOW of a microlight aircraft.

4.20 There are currently five examinations covering:

- Air Law
- Human performance and Limitations
- Navigation
- Meteorology
- Aircraft (General)

4.21 Communications examination would also be required if the student pilot is training for the Flight Radio Telephony Operators Licence (FRTOL).

4.22 An applicant for the sub-ICAO licence would alternatively be permitted to pass the theoretical knowledge exams for the Part-FCL PPL(A), and if they applied for a PPL in the future, the knowledge requirements would already be met.

4.23 When transitioning between aircraft classes, the applicant would be required to demonstrate, via oral questioning, adequate theoretical knowledge of:

- Operational procedures;
- Flight performance and planning;
- Aircraft general knowledge.

> Question
>
> Do you agree that the existing microlight theoretical knowledge syllabus provides an adequate basis for the proposed sub-ICAO licence?
>
> Yes No Undecided No view/don't know
>
> Please add any comments you may have.

PPL upgrade

4.24 The proposed upgrade path from the sub-ICAO licence to the ICAO PPL(A) would consist of:

1) Meet the ICAO Annex 1 requirements;
2) Training as required at an ATO or DTO;
3) PPL skills test; and
4) Theoretical knowledge exams in:
   - Air law and operational procedures;
   - Aircraft General Knowledge – covering airframe, instruments, electrical systems, emergency equipment and powerplant;
   - Principles of flight;
   - Performance; and
   - Radio navigation.

4.25 The ICAO Annex 1 requirements consist of:

1) 40 hours flight time as a pilot of aeroplanes, appropriate to the class rating sought; and
2) 10 hours of solo flight time appropriate to the class rating sought, under the supervision of an authorized flight instructor, including 5 hours of solo cross-country flight time with at least one cross-country flight totalling not less than 270 km (150 NM) in the course of which full-stop landings at two different aerodromes shall be made.

Other issues

4.26 The concept and privileges of the microlight instructor would be retained. Training on aircraft above the microlight class would be provided by Part-FCL aeroplane instructors.

4.27 The existing syllabus for the NPPL(A) on microlight aircraft allows the exercise of limited privileges without instructor supervision, referred to as 'operational limitations' – pilots may fly 8 NM from the departure point and are not permitted

to carry passengers. The Aircrew Regulation also allows a similar arrangement for the LAPL(A), although the UK does not make use of this.

4.28 We committed in the phase 1 consultation to exploring the expansion of operational limitations. However, some within the working group questioned the relevance of this concept beyond use in microlight training, arguing that it could introduce more complexity, with limited benefit. We have not heard any strong arguments in favour of extending operational limitations beyond microlights.

> Question
>
> Do you agree that we should not expand the concept of operational limitations beyond the microlight category?
>
> Yes No Undecided No view/don't know
>
> Do you have any comments regarding operational limitations?

4.29 We propose to allow the addition of the Instrument Meteorological Conditions (IMC) Rating/Instrument Rating (Restricted) to the sub-ICAO licence. The addition of the Night rating is already possible on both the NPPL(A) and LAPL(A) and this would be retained. Note that microlight aeroplanes are not currently approved for flight in IMC or at night, however other aeroplanes within the scope of those licences may be IMC approved.

> Question
>
> Do you agree that we should allow the IMC Rating/Instrument Rating (Restricted) to be added to the NPPL(A) and LAPL(A) licence?
>
> Yes No Undecided No view/don't know

4.30 We propose that the medical requirement for the issue of the sub-ICAO licence would be to make a pilot medical declaration (PMD), as per the current NPPL(A). The PMD requirement is to meet the medical standard for driving a car.

> Question
>
> Do you agree that we should allow pilot medical declarations to be made for the initial issue of the sub-ICAO licence?
>
> Yes No Undecided No view/don't know

Licence title

4.31 In the first consultation, we suggested the revised sub-ICAO licence be called the 'PPL (Light)'. However, a new term may cause more confusion, so it may be more straightforward to use an existing licence title, either the NPPL or LAPL.

4.32 It is more important that the characteristics of the licence are optimal and meet the needs of the community, rather than what it should be called. Nevertheless, we would like to gauge the community on a title.

> Question
>
> What do you believe the revised sub-ICAO licence should be titled?
>
> - LAPL
> - NPPL
> - PPL (Light)
> - Other (please specify below)
> - No view/don't know
>
> Do you have any comments or suggestions on the naming of this licence?

Option 2 – retain the LAPL(A) and NPPL(A)

4.33 Option 2 is a 'minimum change' option, in which the NPPL(A) remains as the microlight licence and the LAPL(A) continues in its current form. The NPPL(A) with Simple Single-Engine Aeroplane (SSEA) or SLMG class ratings would be discontinued.

4.34 The LAPL(A) would be enhanced, for example removing the requirement for 10 hours Pilot in Command (PIC) post licence issue before carrying passengers and allowing the addition of the IMC or IRR rating as per paragraph 4.29.

4.35 The pathway for microlight pilots holding an NPPL(A) to gain a LAPL(A) would be improved. The previous arrangements for moving from microlight to SSEA within the NPPL system would provide a basis for this:

- Flight training as required;
- Theoretical knowledge exams in aircraft general knowledge and principles of flight; and
- Pass the LAPL(A) skills test.

4.36 The holder of a LAPL(A) with an SEP rating would retain the privilege to fly a microlight aeroplane, subject to differences training. Holders of an NPPL(A) who subsequently gain a LAPL would no longer need the NPPL licence.

4.37 The existing upgrade path from LAPL(A) to PPL(A) would remain. Pilots wishing to upgrade directly from an NPPL(A) to a PPL(A) could make use of a route similar to that described in paragraphs 4.24 and 4.25.

4.38 For this option the LAPL(A) would retain commonality with PPL theoretical knowledge, including the proposed changes for the PPL outlined in Chapters 2

and 6. The NPPL would use the current examinations for the NPPL(A) on microlight aircraft.

Discussion

4.39 During the development of the proposals, we have focused on option one. We believe it provides an effective solution to consolidating the sub-ICAO licensing provisions.

4.40 The legal implementation of option one is more complex than two, however we believe it can be achieved without causing confusion for stakeholders.

4.41 Feedback has indicated that the training and qualification system for microlight aeroplanes is fit for purpose; to that end, we are not proposing significant changes to the requirements in this area.

4.42 A recurring consideration has been how to treat the sub-ICAO qualification for aeroplanes that are above the microlight category, but with an MTOW of not more than 2,000 kg.

4.43 Consideration of the existing LAPL(A) suggests that it may be too close to the PPL(A) to provide a real alternative for pilots wishing to only fly aircraft up to 2,000 kg MTOW. We have issued around 1,000 LAPL(A) licences to new pilots since introduction in 2012 and around 1,400 LAPL(A) licences to existing NPPL(A) holders. By contrast, the CAA issues around 1,700 new PPL(A) licences every year.

4.44 The LAPL(A) requires 15 hours less flight time than the PPL(A), however the syllabus reductions in the LAPL(A) are small (no radio navigation or instrument appreciation) and in practice, does not normally equate to a 15-hour difference. The theoretical knowledge requirements are also the same.

4.45 Option one moves the requirements for aircraft up to 2,000 kg MTOW closer to the microlight system, potentially making them more accessible.

4.46 Option two represents a minimum change approach and would be more straightforward to implement, however we believe retaining two separate licence titles within the sub-ICAO provisions would not fulfil the aims of simplifying the licensing structure. However, option two would still be an improvement over the status quo, with better pathways between the NPPL(A), LAPL(A) and PPL(A).

4.47 We prefer Option one, the single sub-ICAO licence which fulfils the intent of the simplification project. It is consistent with that proposed in the first consultation, and we think it still reflects the best long-term outcome for the community.

Question

Which option for the revised sub-ICAO licence would you support?

- Option 1: single sub-ICAO licence
- Option 2: retain both the NPPL(A) microlight class rating and LAPL(A), and discontinue NPPL(A) with SSEA and TMG class ratings
- Undecided
- No view/don't know

Do you have any comments, including any objections or alternative proposals?

Existing licence holders

4.48 We would aim to apply the advantages of any changes to existing licence holders, such as improved pathways between aircraft classes or simplified revalidation requirements.

4.49 If option one is adopted, we would assign a common title for the sub-ICAO licence. Holders of existing sub-ICAO licences with a different title could be deemed equivalent, such that any changes would apply, without having to exchange the licence document.

4.50 If option two is adopted, improvements to the LAPL(A) or NPPL(A) would apply to existing licence holders.

4.51 Changes would be communicated to affected licence holders and it would be their responsibility to comply with any new requirements.

Question

Do you agree with our approach to existing licence holders?

Yes No Undecided No view/don't know

Do you have any comments?

Chapter 5

Maintenance of privileges

5.1 There are opportunities to simplify the revalidation requirements. ICAO Annex 1, paragraph 1.2.5.1.1 indicates that states 'should establish maintenance of competence and recent experience based on a systematic approach to accident prevention.' The ICAO statement is broad and leaves considerable discretion to national aviation authorities in how the requirement is applied in regulation.

Current issues

5.2 There is currently a lack of standardisation in the revalidation requirements across different GA licences and ratings.

5.3 **Instructor/examiner surveillance:** this is not stipulated in the ICAO standards, but there seems to be a consensus among national aviation authorities to require some sort of professional oversight of pilot competence through refresher training with an instructor and/or formal evaluation, such as a proficiency check with an examiner.

5.4 **Whether experience should be included in the revalidation requirements:** the number of flight hours the holder is required to conduct is not mandated in the ICAO standards and recommended practices. Some aeroplane classes such as MEP stipulate no experience requirement – just a proficiency check with an examiner. However, SEP, microlight and motor glider classes of aircraft in the UK all have a flight experience element in the revalidation requirements.

5.5 **Validity and periodicity:** how is the validity period defined – rolling or fixed, and what actions are required should this timeframe lapse.

Discussion and proposals

Different revalidation requirements

5.6 In the UK there is variance in the revalidation requirements, depending on the licence and rating endorsed. The requirements between the PPL(A), LAPL(A) and NPPL(A) are all slightly different.

5.7 Despite the differences, there is broadly the following model:

- Experience: 12 hours of PIC time across a validity period of 24 months, with an exception for microlight/SLMG class ratings issued prior to 2008, which requires 5 hours across 13 months.

- Instructor/examiner intervention: refresher training with an instructor during the validity period of the rating is most common, but there is also the option of a proficiency check with an examiner if no experience can be demonstrated.

5.8 We propose to create a single revalidation requirement for all single-engine class ratings: single-engine non-turbine, microlight, SLMG depending how we settle with the class rating reforms described in Chapter 3. The exact combination of experience and refresher training/proficiency check requirements would depend on the considerations set out below.

The need for instructor/examiner surveillance

5.9 Such surveillance is considered an important element of professional oversight of pilot competence, thereby assuring 'a systematic approach to accident prevention' as stipulated in the ICAO standards. Moreover, every other class or type rating requires at least some form of periodic exposure to training or checking, including microlight and SLMG ratings issued post-Feb 2008.

5.10 The exception to this is the General Exemption currently ORS4 no.1582 that allows microlight/SLMG class rating holders issued prior to 2008 to continue to meet their revalidation requirements through experience only, with no need for instructor/examiner intervention.

5.11 This latter point and the fact that an individual could conceivably fly for years in this way has been raised to us by the Aircraft Accident Investigation Branch (AAIB) and a Safety Recommendation has been issued calling for a review of this, which has fallen within the auspices of this project.[8]

5.12 We propose to not renew General Exemption no.1582 in September 2025, and require all microlight pilots regardless of when their rating was issued, to comply with the current revalidation requirements which includes undertaking an hour of refresher training with an instructor every 24 months, in line with the requirements of other single-engine non-turbine ratings.

5.13 Although it was argued by some within the working group that there is insufficient accident/occurrence data to warrant reviewing this alleviation, we share the observations of the AAIB. The maintenance of competence of microlight and motor glider pilots with a rating issued prior to February 2008 is not being actively monitored, and we have concluded that this constitutes an important gap in safety standards.

[8] AAIB accident report Flight Design CT2K G-CBDJ, published June 2023

Question Do you maintain your microlight or SLMG in accordance with General Exemption no.1582? ie your class rating was issued prior to 1 Feb 2008, and you comply with 5 hours' experience in 13 months, with no refresher training required. Yes No Not applicable/don't know
Question Would you object to requiring all microlight and SLMG class rating holders (regardless of date of issue) to comply with the requirement to undergo at least refresher training with an instructor every 24 months? Yes No Undecided No view/don't know

Refresher training review

5.14 Currently the material covered in the refresher training is broadly left to the instructor or training organisation. There are recommended practices published for the refresher training contents in sources such as TrainingCom, but there is not an Acceptable Means of Compliance (AMC) or even Guidance Material (GM) to support the requirement and provide a structure for those supervising such refresher training.

5.15 We intend to develop content for dual refresher training that could be included as Acceptable Means of Compliance and/or Guidance Material and will be exploring and consulting on ideas for this as part of Phase 3 of this project later in 2024.

5.16 EASA has been reviewing this recently in its Rulemaking Task and has settled on revising its own Acceptable Means of Compliance to provide more substantive content, which provides us with a useful starting point:[9]

AMC1 FCL.140.A(a)(1)(ii); ~~FCL.140.H; FCL.140.S; FCL.140.B~~ LAPL(A) — Recency requirements

CONTENT OF THE REFRESHER TRAINING

(a) ~~Training flight items should be based on the exercise items of the proficiency check, as deemed relevant by the instructor, and depending on the experience of the candidate. For aeroplanes and helicopters, the~~ Before the flight training takes place, the instructor should hold a briefing with the pilot. That briefing should include a discussion on all of the following:

[9] EASA Opinion 05-2023

(1) TEM with special emphasis on decision-making when encountering adverse meteorological conditions or unintentional IMC~~,~~;

(2) as well as on navigation flight techniques ~~capabilities~~;

(3) exercises as specified in point (b), as applicable.

(b) Flight training items should be based on the exercise items of the proficiency check, as deemed relevant by the instructor, and depending on the experience of the candidate. In any case, the instructor should select scenarios from the following list and include in the flight training the relevant recognition and recovery exercises:

(1) clean stall;

(2) approach to stall in descending turn with bank with approach configuration and power;

(3) approach to stall in landing configuration and power; and

(4) approach to stall, climbing turn with take-off flap and climb power

(5) simulated loss or partial loss of engine power during different phases of flight.

~~For sailplanes and balloons, the discussion should place special emphasis on principal occurrence categories of the activity that is covered by the licence.~~

Question

Do you support our approach to create Acceptable Means of Compliance and/or Guidance Material covering the conduct of Refresher Training?

Yes No Undecided No view/don't know

Please provide us with any comments or suggestions you have in this area.

Should experience be included in the requirements, and if so, how?

5.17 There was discussion in the working group as to whether the experience element should be removed altogether, leaving just an hour of refresher training with an instructor.

5.18 Proponents argued that the experience element of the revalidation requirements in the UK/EASA regulations goes beyond the ICAO Annex 1 standard and there was insufficient evidence to suggest that 'hour counting' leads to lower fatal accidents. Flight experience requirements for class ratings are also not commonly found outside the UK/EASA system.

5.19 The working group was divided on this viewpoint, with opponents of removing the experience element arguing that this would result in skill fade, which could not be sufficiently recovered by a refresher training flight.

5.20 It may be appropriate to strengthen the refresher training requirement; for example, making the training more structured, and requiring that it is conducted in a flight of at least one hour. Currently multiple flights can be totalled towards the hour of refresher training, which may reduce the efficacy.

Option 1: Removing experience element from revalidation requirements

5.21 This option would remove the experience requirement altogether, retain the requirement for refresher training with an instructor every two years. The option of a revalidation proficiency check with an examiner would become redundant. The requirements for the renewal of lapsed class ratings would remain unchanged.

5.22 An example of how this might be drafted is set out below, if we were to use the current approach in Part-FCL that sets out the requirements in hard law:

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 ~~12 months preceding the expiry date~~ validity period of the rating, complete ~~12 hours of flight time in the relevant class, at least 6 hours of which shall be in the 12 months preceding the expiry date of the rating including within the rating validity period:~~

~~— 6 hours as PIC,~~

~~— 12 take-offs and 12 landings, and~~

— refresher 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.'

5.23 Similarly for ANO licences, an amendment to Table B, Chapter 2, Part 3 of Schedule 8:

Table B – Experience requirements for issue of certificate of revalidation in accordance with paragraph 2(b) of Table A

(a) The holder has, as a pilot, in an aeroplane specified in the aeroplane class rating and within the period of validity of the current certificate of revalidation for the rating

~~a. (i) flown at least 12 hours which includes at least 8~~ 6 ~~hours as pilot in command;~~

b. ~~(ii) completed at least 12 take-offs and 12 landings;~~

~~c. (iii)~~ subject to sub-paragraph (b), undertaken at least one hour of flying training with an instructor, in accordance with AMC 1 FCL.740.A, who is entitled to give instruction on aeroplanes of that class~~; and~~

d. ~~(iv) flown at least six hours in the 12 months preceding the specified date~~.

Question

Do you agree with this proposal of removing the experience element from the revalidation requirements?

Yes No Undecided No view/don't know

Do you have any comments?

Question

If we were to remove the experience element from the requirements to maintain validity of a class rating, which of the following do you think is most appropriate?

- Undertake refresher training of at least one hour with an instructor, during the validity period
- Pass a proficiency check with an examiner during the validity period
- Familiar with the issues but am undecided either way
- No view/don't know

Do you have any comments, including any objections or alternative proposals?

Option 2: Aligning experience/intervention requirements

5.24 If we were to keep the experience component in revalidation requirements, we would consider aligning the revalidation requirements across all the single-engine non-turbine aeroplanes, including microlights, motor gliders, and the sub-ICAO aeroplane licence, taking elements from the existing requirements:

Table 5.1: Experience and instructor/examiner intervention

Option	Requirement	Notes
Experience	12 hours of flight time including 12 take-offs/landings of which 6 hours PIC in the second half of the validity period.	• Borrows the PPL(A)-SEP standard of 12 hours minimum 6 PIC. • Borrows the NPPL approach for the 6 hours PIC to be in the second half of the validity period.
Experience	Refresher training of at least one hour with an instructor undertaken (in the second half of the validity period).	• Requires the refresher training to be conducted in the second half of the validity period (as per PPL(A)-SEP) • Sets out AMC or GM for the Refresher Training
Proficiency check	Proficiency check with an examiner at any time	• Adopts the PPL(A)-SEP approach

5.25 A combination amendment of the ANO and Part-FCL would be required to align the PPL(A) and the sub-ICAO licence requirements.

5.26 Example of how this change might be implemented in Part-FCL:

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 ~~12 months preceding the expiry date~~ validity period of the rating, complete 12 hours of flight time in the relevant class, at least 6 hours of which shall be in the 12 months preceding the expiry date of the rating including within the rating validity period:

— 6 hours as PIC,

— 12 take-offs and 12 landings, and

— refresher 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.

5.27 For the NPPL(A), this would require an amendment to Chapter 2, Part 3 of Schedule 8 of the ANO. An example of how we might amend this:

Table B – Experience requirements for issue of certificate of revalidation in accordance with paragraph 2(b) of Table A

(a) The holder has, as a pilot, in an aeroplane specified in the aeroplane class rating and within the period of validity of the current certificate of revalidation for the rating

(i) flown at least 12 hours which includes at least ~~8~~ 6 hours as pilot in command;

(ii) completed at least 12 take-offs and 12 landings;

(iii) subject to sub-paragraph (b), undertaken at least one hour of flying training with an instructor, in accordance with AMC 1 FCL.740.A, who is entitled to give instruction on aeroplanes of that class; and

(iv) flown at least six hours in the 12 months preceding the specified date.

(b) If the holder has not undertaken the flying training specified in paragraph 1(a)(iii) a certificate of revalidation may be issued but must be endorsed "single seat only".

Question

Do you agree with the approach of having a single revalidation requirement across all single-engine non-turbine aeroplane class ratings for the sub-ICAO licence?

Yes No Undecided No view/don't know

Do you have any comments, including any objections or alternative proposals?

Chapter 6

Theoretical knowledge: common elements

Exam procedures

6.1 We considered the regulations associated with the theoretical knowledge examinations, with the aim of making it easier for training organisations to integrate them with the flight training and potentially less of a disincentive to complete the course.

6.2 In Chapter 4 we set out our preferred Option 1 for the sub-ICAO licence, which would see the NPPL(A) microlight syllabus used as the basis for the theoretical knowledge requirements. In line with our commitments to move services to digital platforms, we would look to bring the revised sub-ICAO examinations into the eExams system.

> Question
>
> Do you agree that if we use the NPPL(A) Microlight syllabus and examinations, we should bring the sub-ICAO theoretical knowledge examinations into the eExams system?
>
> Yes No Undecided No view/don't know

6.3 Many pilots use mobile devices for assistance with navigation and flight planning. The use of these devices with associated software, for example a tablet device and SkyDemon, has been a major development and is central to efforts to reduce airspace infringements. These systems can also be used with electronic conspicuity devices to help with spotting other aircraft and mitigate the risk of mid-air collision.

6.4 The current syllabus supports the traditional navigation principles of deduced reckoning and map reading. Flight planning and track monitoring is calculated by using an analogue flight computer, for example Pooleys CRP 1.

6.5 We believe there are benefits for student pilots learning to use such flight planning software as part of their training course. Not to replace the basic principles of navigation and flight planning but to improve the use of these systems and to make improvements in airspace and situational awareness.

6.6 We propose to encourage the use of these devices as part of the theoretical knowledge training. We are not proposing, at this time, to allow these systems to be used in the examinations for navigation and flight planning and performance.

> Question
>
> Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software during the theoretical knowledge training for navigation and flight performance and planning exercises?
>
> Yes No Undecided No view/don't know
>
> Do you have any comments?

6.7 We are also proposing to encourage the use of mobile devices with flight planning and monitoring software, during the flight training exercises.

6.8 Student pilots will still need to know how to plan and monitor a flight using those basic principles and systems for the licence skill test.

> Question
>
> Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software during the flight training exercises?
>
> Yes No Undecided No view/don't know
>
> Do you have any comments?

Exam validity periods

6.9 We are proposing to extend certain exam validity periods. We have had to balance this with concerns about skill and knowledge fade, so will not be removing the validity periods completely.

6.10 We are considering changing the 18-month period within which all examinations must be passed for the issue of the licence, to a rolling validity period. This means if an examination goes outside of the 18-month period, the candidate does not have to retake all the examinations again – only the examination(s) that fall outside of the 18-month period.

> Question
>
> Do you agree with amending the validity period of the examinations to change the 18-month period in which all examinations must be passed within a certain period to a rolling validity period?
>
> Yes No Undecided No view/don't know

6.11 The 18-month validity period is not applicable to current NPPL(A) microlight examinations, and we are not proposing to implement this requirement. If these

examinations are to be used for the sub-ICAO licence, unless they are incorporated into the eExam system, then this requirement would apply.

6.12 We are also considering amending the maximum period in which a completed set of examinations are valid towards the issue of a licence from the existing 24-month period to 36 months.

> Question
>
> Do you agree with amending the period in which a completed set of examinations are valid towards licence issue from 24 months to 36 months?
>
> Yes No Undecided No view/don't know

6.13 With the data we are now collecting in the eExam system, we have seen a slight increase in the number of candidates who have failed to pass an examination within four attempts.

6.14 If an examination candidate fails to pass an examination within four attempts, they forfeit any examination passes they have already and must start again, after a period of theoretical knowledge training.

6.15 Many of these student pilots have not continued with their training towards a licence. We would like to better understand why these student pilots are ceasing their training and if the requirement to retake all the examinations again was a factor.

6.16 We would like to explore alternative options to requiring all the examinations to be retaken.

> Question
>
> If a student fails any one exam four times, is the requirement to retake all of the examinations again a factor in a student pilot stopping their course?
>
> Yes No Undecided No view/don't know
>
> Do you have any comments?

> Question
>
> Do you have any suggestions how we could replace the requirement to retake all the examinations, where a candidate has failed to pass an examination within four attempts?
>
> Answer: _____

Chapter 7

Instrument ratings review

7.1 Since the implementation of the Competency Based Modular (CBM) training course for the Instrument Rating (Aeroplanes) [IR(A)] and the Enroute Instrument Rating (EIR) in 2014, EASA conducted a further rulemaking task with the aim of helping more European pilots to fly in accordance with Instrument Flight Rules (IFR) and in Instrument Meteorological Conditions (IMC).

7.2 EASA commenced Rule Making Task (RMT.0677)[10] in 2015, to allow for easier access to IFR for GA licence holders. This resulted in the implementation of the Basic Instrument Rating (BIR) in the EASA Aircrew Regulation.

7.3 The BIR was not assimilated into UK legislation by the European Union (Withdrawal) Act 2018, since it would have provided limited utility for UK pilots.

7.4 Despite having participated in the rulemaking task that developed the BIR, since the UK is now a third country to EASA, and as the BIR is not considered to be issued in accordance with ICAO Annex 1, UK licence holders would not have been able to exercise the privileges of the BIR outside of UK airspace, unless with the agreement of the state within which the aircraft was operating.

7.5 We are not proposing to implement the BIR. However, the aims of the BIR are still sound in concept – to enable easier access to IFR flying for pilots of GA aeroplanes. This would enable pilots to plan and complete flights with greater confidence, less vulnerability to changing weather conditions and mitigate the risks of continued VFR flight into IMC.

7.6 We therefore considered what changes could be made to the IR(A) to make it more accessible, whilst ensuring compliance with ICAO Annex 1.

7.7 We are not proposing to make any changes to the Instrument Rating for helicopters or airships, only aeroplanes.

[10] ToR (+ Concept Paper) RMT.0677) - Easier access of General Aviation (GA) pilots to instrument flight rules (IFR) flying | EASA (europa.eu)

Cloud flying rating

7.8 We sometimes receive requests to implement a similar privilege for aeroplanes to that used by the gliding community for cloud flying, which helps glider pilots when soaring. This would enable licence holders operating to fly through cloud and access Visual Meteorological Conditions (VMC) above.

7.9 Given the challenging nature of flying in cloud and that if not practiced regularly, the likelihood of skill fade, we did not consider this option further.

Amending the Instrument Rating (Aeroplanes)

7.10 When considering what amendments to the IR(A) may facilitate more pilots gaining the rating, we reviewed the work of the rulemaking task run by EASA which developed the BIR. The 2019 Opinion[11] explained the proposals covering:

- Use of competency-based training
- Training structure
- Privileges and limitations
- Theoretical knowledge
- Skill Test
- Training organisation
- Validity, revalidation and renewal

Competency-based training and flight experience requirements

7.11 Currently there are three training routes to gain an IR(A) – integrated, modular and competency-based modular.

7.12 The current modular IR is delivered in two modules, basic instrument and procedural. There is a minimum amount of flight training and allowances for instrument ground time in a qualified synthetic training device.

7.13 The competency-based (CB) training route is also delivered in the same two modules, but the applicant may be credited the following previous flight experience:

(a) Instrument flight instruction provided by an IRI(A) or an FI(A) holding the privilege to provide training for the IR; or

[11] Opinion 01/2019 (A) & (B) - Easier access for GA pilots to IFR flying & Revision of the balloon and sailplane licensing requirements | EASA (europa.eu)

(b) Prior experience of instrument flight time as PIC on aeroplanes, under a rating providing the privileges to fly under IFR and in IMC.

7.14 To determine the amount of flight experience that may be credited and to establish the training needs for the applicant, the training organisation will complete a pre-entry assessment. This will help the training organisation to develop a bespoke training programme, which is documented in a specific training record.

7.15 Although the course is competency based, there is a minimum amount of instrument flight training and a minimum flight experience, which conforms to the recommended minimum of instrument flight experience as per ICAO Annex 1.

7.16 As this training route complies with ICAO Annex 1, we are not proposing any changes to flight experience and training requirements for the IR(A).

Privileges and limitations

7.17 The purpose of the EASA rulemaking task (RMT.0677) was to improve the access to flying under IFR and in IMC for GA pilots, so the rating needed to have similar practical value to the current IR, irrespective of the training route used.

7.18 However, it was decided that by having certain limitations, the practical training time and theoretical knowledge that applicants would need may be reduced, with a small loss of practical utility.

7.19 For example, it is relatively rare in typical GA operations to fly an instrument approach (particularly a 3D one) to absolute minima. Flying to low minima requires regular practice which might not be adequately maintained by the amount of IFR flying GA pilots are likely to conduct. Therefore, EASA placed limitations on the BIR privileges.

7.20 We are not proposing to change the current privileges of the IR(A) which would be available to PPL and CPL holders when flying single pilot, non-high performance, non-complex aeroplanes:

FCL.605 IR – Privileges specifies that the privileges of an IR holder are to fly aircraft under IFR, including PBN operations, with a minimum decision height of no less than 200 ft (60 m).

Theoretical knowledge

7.21 EASA RMT.0677 looked to develop a greater level of proportionality with the syllabus and examinations for the rating. The learning objectives were amended to ensure that areas already studied for and examined to gain the PPL, were not covered again and the main objective was to ensure safe operations of GA aeroplanes in IMC or under IFR.

7.22 The number of examinations were reduced to three focusing on the relevant learning objectives for that module. And although, no minimum amount of theoretical knowledge training was set out, given the syllabus that applicants need to learn, it was considered that approximately 80 hours would be appropriate for the BIR.

7.23 As we are looking to maintain compliance with ICAO Annex 1, we need to ensure that the areas specified in Annex 1 are covered and that applicants understand and can apply the subject knowledge in order to be able to identify and manage threats and errors effectively.

7.24 We have considered the merits of multiple theoretical knowledge examinations compared to a single examination. Currently there are 7 examinations, covering:

- Air Law
- Aircraft General Knowledge – Instrumentation
- Flight Planning and Monitoring
- Human Performance
- Meteorology
- Radio Navigation
- IFR Communications

7.25 There are benefits to breaking the syllabus down to individual subject areas and there is evidence that it helps with long-term learning and retention of knowledge. However, it may be considered a disincentive to have to pass 7 examinations.

7.26 There are also concerns that bringing together all the subjects into one examination could result in a disproportionately large syllabus for the candidate to learn prior to attempting the examination.

7.27 There is a possibility with reviewing the syllabus to ensure that it only covers those essential areas of knowledge, that we will no longer be able to offer the credit to the theoretical knowledge examinations available to the holder of an IR(A), when training for a CPL, as detailed in Appendix 1 to the Aircrew Regulation.

Question
Do you agree that we should consider review the TK syllabus for the IR(A)? Yes No Undecided No view/don't know Do you have any comments?
Question
Do you agree that we should consider consolidating the IR(A) examinations? Yes No Undecided No view/don't know Do you have any comments?

Skill test

7.28 We are not proposing to make any changes to the Skill Test for the IR(A).

Training organisation

7.29 When the EASA rulemaking task developed the proposals for the BIR, the requirements for and structure of the Declared Training Organisations (DTO) had only just been agreed, so the scope of the courses being offered by a DTO did not include the BIR.

7.30 Currently the minimum instrument flight instruction for the IR(A) must be completed by an Approved Training Organisation (ATO), approved to conduct the course.

7.31 The key elements that an ATO must demonstrate for this course are the safety management considerations including the identification of safety hazards and the appropriate mitigations, root cause analysis of safety reports and any identified non-compliances. The training standards considerations are instructor standardisation and adherence to the ATOs approved training manual.

7.32 Adherence to the approved training manual is especially important for the IR(A), given the pre-assessment flight establishes the training needs and the training programme for the applicant.

7.33 The DTO structure is now established, including a mature oversight programme based on our performance-based oversight principles. We are already collecting good evidence of improvements in key areas such as instructor standardisation, adherence to approved training programmes and root cause analysis of any safety reports.

7.34 We are considering expanding the scope of the training courses offered by a DTO to include the IR(A) via the competency based modular route.

> Question
>
> Do you agree that we consider expanding the scope of the training courses offered by a DTO to include the flight training for the IR(A) via the competency-based route?
>
> Yes No Undecided No view/don't know

7.35 DTOs offering the CB-IR course would be required to meet additional requirements. In addition to having suitably equipped aircraft and an instructor with the appropriate privileges to instruct for the IR(A), we would require:

- Enhanced safety management, covering hazard identification and evidence of effective mitigations.
- More comprehensive following up of safety and occurrence reports.
- Development of a training manual covering the IR(A) course.
- Monitoring of adherence to the approved training programme for the IR(A).

> Question
>
> Do you agree that if DTOs are permitted to offering the IR(A) course by the CB training route, they should be required to meet the additional requirements mentioned above?
>
> Yes No Undecided No view/don't know
>
> Do you have any comments?

Validity, revalidation and renewal

7.36 We considered if it was appropriate for the purposes of revalidation to introduce the concept of alternating between a proficiency check and one hour of refresher training from an instructor qualified to teach for the rating.

7.37 This is similar to a proposal considered during the EASA rulemaking task. However, the retained Basic Regulation sets out the essential requirements in Annex IV. This states that an appropriate level of competence in practical skill must be maintained. Compliance must be demonstrated by regular assessments, examinations, tests or checks. The frequency of examinations, tests or checks must be proportionate to the level of risk associated with the activity.

7.38 It is well known that instrument flying is a perishable skill and can deteriorate without frequent practice.

7.39 For a pilot to maintain competence in instrument flying both in IMC and under IFR, they need to practice these skills frequently. For pilots to maintain the

necessary standard they need to be checked on a frequent basis by an examiner. As such, we will:

- Maintain the IR(A) validity period of 1 year.
- For the revalidation of the IR(A), we are not proposing to change the current requirements.
- For the renewal of the IR(A), we are proposing that the assessment and any refresher training required could be delivered by a DTO that has declared to deliver the IR(A) course.

Question
Do you agree that we should keep the validity period of the IR(A) to 1 year?
Yes No Undecided No view/don't know

Question
Do you agree that if DTOs are permitted to offering the IR(A) course by the CB training route, that we consider amending the renewal requirements for the IR(A) to allow the assessment and any refresher training required to be delivered by a DTO that has declared to deliver the IR(A) course?
Yes No Undecided No view/don't know

Enroute Instrument Rating (EIR)

7.40 Since implementation, the CAA has issued 3 Enroute Instrument Ratings. As such, we are also proposing to put in place transitional arrangements for holders of the EIR to move to another instrument qualification and remove this rating from the regulations.

7.41 The following would be the proposed transitional arrangements:

(a) We are proposing to allow EIR holders to continue to exercise the privileges of the EIR until 1 January 2027;

(b) Be entitled to revalidate and/or renew their EIR in accordance with the existing regulations (FCL.825(g)) until 1 January 2027; and

(c) Be entitled to a full credit as per the current regulations, of the training requirements towards the training for the IR(A) by the CB route.

(d) Holders of an EIR will be required to obtain another instrument qualification by 1 January 2027, to continue to exercise the privileges after that date.

(e) Any training courses for the issue of an EIR that have commenced prior to 1 January 2025, would be able to continue and the rating would be issued if all

requirements were met on application within the specified validity periods for the theoretical knowledge examinations and the Skill Test.

(f) After the 1 January 2026, any training course for the issue of an EIR, shall be regarded as training courses for an IR(A) by the CB route. Based on an assessment of the applicant, the training organisation responsible for the IR(A) training course shall determine the amount of EIR training to be credited towards the issue of the IR(A).

(g) Applicants who hold passes in all of the theoretical knowledge examinations for the EIR before the 1 January 2025, which are still within the specified validity periods, shall receive a credit towards the requirements for the IR(A) by the CB route.

Question

Do you agree with removing the EIR from the regulations and the transitional arrangements set out in paragraph 7.41?

Yes No Undecided No view/don't know

Do you have any comments?

IMC and IRR rating

7.42 We are also looking to update the Instrument Meteorological Conditions (IMC) rating, also known as the Instrument Rating (Restricted) [IRR]), over and above our proposal to allow it to be added to an NPPL(A) or LAPL(A), as described in paragraph 4.29 above. We have been exploring updating both the theoretical knowledge and flight training syllabus to incorporate Performance Based Navigation (PBN) training and terminology.

7.43 We will also be bringing the theoretical knowledge examinations for the IMC/IRR Rating into the eExams system.

7.44 We are also proposing to change who can instruct for the IMC/IRR Rating. Currently the IMC/IRR Rating can be delivered by an ATO or DTO, or a suitably qualified independent Flight or Instrument Rating Instructor.

7.45 We are proposing to require the IMC/IRR Rating to be delivered by an ATO or DTO only.

7.46 We believe the structures associated with a training organisation including an oversight programme based on our performance-based oversight principles, instructor standardisation, adherence to approved training programmes and root cause analysis of any safety reports would be of great benefit to the delivery of the IMC/IRR Rating.

Question

Do you agree that we should require the delivery of the IMC/IRR Rating within either an ATO or DTO?

Yes No Undecided No view/don't know

7.47 Currently the requirements and syllabus for the IMC Rating are set out in CAP 804, which is for reference only. We are proposing to develop a new CAP to bring together the requirements and syllabus in CAP 804 and guidance for applicants taking the initial Skill Test and revalidation test as detailed in Standards Document 25(A).

7.48 We will also take this opportunity to update the syllabus to include the flight training and the learning objectives associated with performance-based navigation (PBN).

7.49 CAP 2138 set out how the incorporation of PBN privileges and competence for IR holders would be managed, it mentioned that holders of an IMC/IRR Rating should seek appropriate training prior to attempting a RNP approach, this proposed CAP will help set out what that training should consist of.

7.50 The guidance in Standard Document 25(A) already includes the criteria if an RNP approach is to be used, so we are not proposing any further changes to the Skill Test.

7.51 The validity period of the IMC/IRR Rating is set in Schedule 8 of the Order. This is currently 25 months. As part of our proposal to simplify the requirements we are proposing to change this to 24 months.

Question

Do you agree with our proposal to change the validity period of the IMC/IRR rating from 25 to 24 months?

Yes No Undecided No view/don't know

Chapter 8

Other issues

Flight Instructor TK

8.1 Applicants for a Flight Instructor (FI) Certificate who wish to teach for the PPL(A) are required to hold a CPL or have passed the CPL theoretical knowledge examinations. This is an ICAO Annex 1 requirement which we will maintain.

8.2 The FI course also includes theoretical knowledge instruction covering teaching and learning techniques, understanding of the syllabus and aviation technical knowledge.

8.3 Concerns have been raised to the CAA about the competence, depth of and application of appropriate theoretical knowledge by some flight instructors.

8.4 We are considering a review of the prerequisite theoretical knowledge, course teaching, learning and theoretical knowledge instruction requirements for the FI. We need to ensure that the requirements prepare an FI to be competent and able to deliver quality flight and theoretical knowledge training.

> Question
>
> We would appreciate your views on how we can improve the prerequisite theoretical knowledge, course teaching, learning and theoretical knowledge instruction requirements for the FI.
>
> Views: _____

Aerobatics rating

8.5 Prior to the introduction of the EASA Aircrew Regulation, there was no requirement in UK law for a pilot to hold a rating for aerobatic flight. This remains the case for licences issued in accordance with ANO 2016.

8.6 However, Part-FCL licence holders must hold an aerobatic rating if conducting aerobatics. The aerobatic rating must be conducted at an ATO or DTO and by an instructor with the privileges to teach the rating.

8.7 This misalignment of requirements between the ANO and Part-FCL creates confusion within the community and training organisations.

8.8 We are not suggesting that a licence holder should not be competent and trained before undertaking an aerobatic flight; however, it may be possible to maintain an acceptable level of safety, without the need for a formal rating.

8.9 Prior to the aerobatic rating requirement, many pilots undertook courses of training voluntary – often the same courses now offered by training organisations towards for the issue of the rating.

> Question
>
> Should an aerobatics rating be required for all licence holders conducting this activity?
>
> Yes No Undecided No view/don't know
>
> Do you have any comments?

Sailplane towing rating

8.10 There is no requirement in the ANO 2016 for a licence holder to have a specific rating to tow either a banner or a glider. However, Part-FCL applies such a requirement for the towing of sailplanes.

8.11 Prior to the Aircrew Regulation, coaching for a pilot to be authorised to fly the towing or 'tug' aeroplanes was delivered by a senior 'tug pilot' or the 'tug master' at a gliding club. The British Gliding Association (BGA) developed a towing manual, which sets out the training syllabus and competencies that the pilot should display prior to being authorised to tow at a gliding club.

8.12 The sailplane towing rating must be conducted at an ATO or DTO and the instructor must have the privilege to instruct for the rating.

8.13 Many gliding clubs use aeroplanes with a permit to fly, due to reduced operating costs and simplified maintenance requirements. However, training organisations offering the rating are required to use an aeroplane that holds a certificate of airworthiness and are therefore not always using aircraft representative of typical glider towing operations.

> Question
>
> Should a sailplane towing rating be required for all licence holders conducting this activity?
>
> Yes No Undecided No view/don't know
>
> Do you have any comments?

Non-Part 21 aircraft and Part-FCL training

8.14 In 2019 EASA introduced requirements into the Aircrew Regulation applicable to non-EASA aircraft (known as non-Part 21 aircraft in UK assimilated law) when used for Part-FCL training.

8.15 These requirements included a safety assessment and authorisation from the relevant competent authority. The requirements are set out in DTO.GEN.240 and ORA.ATO.135, and apply under UK law to non-Part 21 aircraft.

8.16 The safety assessment requirement also applies when a non-Part 21 aircraft is used to meet the biennial refresher training requirement for the LAPL(A) or SEP and TMG ratings endorsed on a Part-FCL PPL.

8.17 We believe it is appropriate that ATOs and DTOs only use aircraft suitable for the intended training. However, the 2019 requirements may be disproportionate in terms of requiring a safety assessment by the CAA, particularly in the case of refresher training with existing licence holders.

8.18 Aircraft flying in accordance with a national permit to fly ('permit aircraft') are also subject to restrictions under ANO article 42, in terms of when they may be used for flight training on a commercial basis. We have issued a general permission under Official Record Series 4 (ORS4), allowing some permit aircraft to be used for this purpose.

> Question
>
> Do you believe any additional requirements for ATOs or DTOs should apply for using non-Part 21 aircraft, above those required for permit aircraft under ANO article 42?
>
> Yes No Undecided No view/don't know
>
> Do you have any comments?

Other issues

8.19 We are also open to comments regarding aeroplane flight crew licensing issues not mentioned in this consultation.

> Question
>
> Do you have any further comments or issues regarding aeroplane flight crew licensing that you wish to raise?

Chapter 9

Proposed AMC on partial power failure

9.1 This project has been asked to explore modernisations to the training syllabus for the ICAO PPL and Sub-ICAO training including exploring proposals to include training to cover partial power failure situations. This is in response to the AAIB Safety Recommendation SR-2022-005 stemming from the accident of a Grumman AA-5 G-BBSA:

'It is recommended that the UK Civil Aviation Authority require ab initio pilots to undergo training in the management of partial power loss situations in single-engine fixed-wing aeroplanes.'

9.2 This chapter summarises the findings of that work strand. Following discussion within the working group, the Aircraft Owner's & Pilot's Association (AOPA) and the Light Aircraft Association (LAA) consulted their respective technical training committees and put forward detailed proposals for the review of the training syllabus and propose inclusion.

Context/current situation

9.3 Successive accident reports have suggested that pilots do not always manage partial power failures effectively.

9.4 Currently the training content in the UK for relevant single-engine aeroplanes covers engine failure. The training syllabi for the PPL(A) Single-Engine Piston rating and the Light Aircraft Pilot Licence (both in Part-FCL) as well as the NPPL Microlight Class and Simple Single-Engine Aeroplane Class Ratings already contains content on:

a) reaction to total engine failure in flight including just after take-off;

b) pre-take-off static power checks to detect signs of engine failure before take-off is attempted; and

c) checks during take-off pre-rotation to detect engine failure and abandon take-off if necessary.

9.5 Despite this material already being in place, it was noted that there is currently no content educating pilots on how partial power failure can be detected and identified, the risks of attempting a return to the aerodrome (following a failure at take-off or during the cruise), and that the immediate actions following a partial power failure at any stage of flight should be the same as those that follow a total engine failure.

9.6 EASA Opinion No 05/2023 proposes to add partial power loss to the biennial refresher training required for the maintenance of LAPL(A) privileges (AMC1 FCL.140.A) and SEP Class Rating revalidation (AMC1.FCL.740.A.).

Recommendation

9.7 The working group recommends that the training syllabus for all single-engine piston-driven aeroplanes should be revised to include content on partial power failure at take-off and at other phases of flight.

9.8 We propose adding a new exercise to the PPL and sub-ICAO licence syllabus. Since AMC FCL.115 LAPL(A) and AMC1.FCL.210 Ex 12/13e already include abandoning take-off and engine failures after take-off, it would be logical to include partial failures within those primary exercises. We suggest adding the words “and reasons for doing so” after the words “abandoned take-off” in subsection A to both syllabi and adding the words “including partial power failures” after the words “engine failures” in subsection B to both syllabi. The exercise need not be carried out prior to first solo but should be introduced during circuit consolidation exercises.

9.9 The training syllabus should be amended to reflect the following Acceptable Means of Compliance and Guidance Material:

- Rejected take-off training should emphasise prompt action following indications of suspected partial loss of power whilst the aeroplane is on the runway.
- During early stages of flight training, due to their limited levels of experience and skills, student pilots should treat partial loss of power after take-off or in the visual circuit as total engine failure and act accordingly.
- Ex 12(e) and 13(e) should be amended to include discussion of partial power loss, but instruction and simulated practice should not be conducted until later in the relevant training course.

9.10 After completion of Ex 16 (Forced Landings without Power) and before Ex 17 (Precautionary Landings), student pilots should be taught recommended handling actions to be taken if partial loss of power is experienced.

Consultation Question

Do you agree with this addition to the syllabus to cover partial power failure situations in aeroplanes?

Yes No Undecided No view/don’t know

Do you have any comments?

APPENDIX A

Abbreviations

AAIB	Air Accidents Investigation Branch
AMC	Acceptable Means of Compliance
ANO	Air Navigation Order
AOC	Air Operator's Certificate
AOPA	Aircraft Owners & Pilots Association
ATO	Approved Training Organisation
BGA	British Gliding Association
BIR	Basic Instrument Rating
CBIR(A)	Competency-Based modular Instrument Rating (Aeroplanes)
CRD	Comment Response Document
DTO	Declared Training Organisation
EASA	European Union Aviation Safety Agency
EIR	En-route Instrument Rating
FCL	Flight Crew Licensing
FRTOL	Flight Radio Telephony Operators Licence
GA	General Aviation
ICAO	International Civil Aviation Organisation
IFR	Instrument Flight Rules
IMC	Instrument Meteorological Conditions
IR	Instrument Rating
IR(R)	Instrument Rating (Restricted)
LAA	Light Aircraft Association
LAPL	Light Aircraft Pilot Licence
MEP	Multi-Engine Piston

MET	Multi-Engine Turboprop
NPA	Notice of Proposed Amendment
NPPL	National Private Pilot Licence
PBN	Performance-Based Navigation
PMD	Pilot Medical Declaration
PPL	Private Pilot Licence
RNP	Required Navigation Performance
SARPs	Standards & Recommended Practices (ICAO Annexes)
SE	Single-Engine
ME	Multi-Engine
SEP	Single-Engine Piston
SET	Single-Engine Turboprop
SLMG	Self-Launching Motor Glider
SPL	Sailplane Pilot Licence
SSEA	Simple Single-Engine Aeroplane
TMG	Touring Motor Glider
VFR	Visual Flight Rules
VMC	Visual Meteorological Conditions

APPENDIX B

Aeroplanes working group community members

The Aeroplanes working group comprised of the following individuals from the GA community, acting in the capacity of subject matter experts, as opposed to representatives of associations:

- David Cockburn
- Rob Hughes
- Leah Mansfield
- Andy Miller
- Julian Scarfe
- Geoff Weighell
- Nick Wilcock

Note that members holding roles within GA associations were invited to share for technical feedback discussion papers and proposals within their respective technical panels.