

General Aviation Pilot Licensing Review

Phase 2: Detailed Proposals

Aeroplanes

Consultation – Executive Summary

CAP 2974C



Published by the Civil Aviation Authority, 2024

Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

You can copy and use this text but please ensure you always use the most up to date version and use it in context so as not to be misleading, and credit the CAA.

First published March 2024

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

Please direct enquiries regarding the content of this publication to: ga.consultations@caa.co.uk

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

Summary

1. The CAA is now continuing with the project to simplify General Aviation (GA) flight crew licensing and training, and this paper consults on detailed proposals for Aeroplanes. Similar consultations are being undertaken for aeroplanes, sailplanes, and helicopters and gyroplanes. This consultation closes on 22 May 2024.
2. This document summarises the contents of CAP2974A Aeroplane Licensing Phase 2 Consultation and presents just a high-level summary of our key proposals, a note on the background and next steps, and the consultation questions themselves.

How to respond to this consultation

3. Readers wishing to see further detail and explanation of these proposals should refer to the main document. To assist with this, we have grouped the proposals below and the consultation questions by the chapters where they can be found in that document.
4. Most questions in this consultation provide a list of possible answers, and many (but not all) will also provide space to comment. Regarding the possible answers, the format often 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.
5. The consultation closes on **22nd May 2024**. Please submit responses via our website: <https://consultations.caa.co.uk>

Specific proposals

Chapter 2: 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.

Chapter 3: 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.

Chapter 4: 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).

Chapter 5: Maintenance of privileges

- 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.

Chapter 6: Theoretical knowledge: common elements

- Improvements to exam procedures and validity periods.

Chapter 7: Instrument ratings review

- 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).

Chapter 8: 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.

Consultation questions

Chapter 1: Background

Question

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 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, e.g., local resident, etc.
- None of the above: I do not participate in this part of aviation but have an interest in these issues.

Question

Is your response the formal submission of an organisation?

- No
- Yes: organisation: _____
- Note we would normally expect only one submission per organisation.

Chapter 2: ICAO PPL(A)

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.

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.

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?

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 on this, including under what circumstances should this be counted?

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

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.

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.

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

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.

Do you have any comments on this?

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.

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

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.

Do you have any comments on this?

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?

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.

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.

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?

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?

Question

Do you agree with our approach to existing licence holders?

Yes No Undecided No view/don't know.

Do you have any comments on this?

Chapter 5: Maintenance of privileges

Question

Do you maintain your microlight or SLMG in accordance with General Exemption no.1582? e.g., 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.

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.

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 on this?

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?

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

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.

Question

Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software during the Navigation exercises?

Yes No Undecided No view/don't know.

Do you have any comments?

Question

Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software in the Navigation and Flight Performance and Planning training?

Yes No Undecided No view/don't know.

Do you have any comments?

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.

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.

Question

In the event that 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 Rating Review

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?

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.

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?

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.

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?

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.

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**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: _____

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?

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?

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?

Question

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

Comments _____

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?