

General Aviation Pilot Licensing Review Phase 2: Detailed Proposals – Gyroplanes

A consultation

CAP 2974G



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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

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Summary

Introduction and how to respond

1. In October 2022, we published [CAP 2335](#) (General Aviation Pilot Licensing & Training Simplification – Phase 1: Strategic Direction) as part of a 3 Phase program to simplify training and licensing for the UK's General Aviation (GA) Sector.
2. The subsequent GA community response ([CAP 2532](#)) showed strong support in several key areas for updating our current legislation with regards to Licensing and Training.
3. This consultation (Phase 2) will explore these key areas in more detail, to ensure that we are working towards the goals of the community whilst maintaining legislative compliance within these areas.
4. This document will cover each key area and specific proposals as detailed below. Sub-Group consultations for aeroplanes, balloons and airships, sailplanes and helicopters will be issued separately.
5. This consultation closes on **22nd May 2024**. Please submit responses via our website: <https://consultations.caa.co.uk>.
6. The outcome of this consultation will help finalise the proposals for the simplification of licensing and training. The final proposals and legal drafting will be developed with the Department for Transport and presented for legislative amendment Spring 2025.

Specific Proposals

Differences Training

- Consult on the definition and minimum requirements for differences training on Gyroplanes.

Crediting towards other licence categories

- Consider the credit available to holders of a PPL(G) towards gaining a pilot's licence in another category.
- Consider the credit available to holders of pilot's licences in another category towards gaining a PPL(G).

Instructor Supervision

- Consultation on the wording used for the supervision of restricted FI(G).

Class Rating Validity

- Considers the revalidation requirements of the gyroplane class rating.

Requirement for an ATO for FIC

- Considers if a DTO can provide FIC training.

Gyroplane focused PPL Exam

- Considers Gyroplane focused examinations and if these should be delivered through eExams system.

Other items of clarification

- Specific FRTOL for PPL(G)
- Medical requirements for CPL(G) and FI(G).

Chapter 1

Background & scope

Background

- 1.1 The CAA has continued throughout 2023 with the project to simplify General Aviation (GA) flight crew licensing and training. This paper consults on a detailed proposals for gyroplanes. Similar consultations are being undertaken for aeroplanes, balloons and airships, sailplanes, and helicopters.
- 1.2 This work follows an earlier consultation [CAP 2335](#) in Autumn 2022. The 1,246 GA community responses¹ (summarised in [CAP 2532](#)) showed strong support in several key areas for updating our current legislation with regards to licensing and training.
- 1.3 This 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 the CAA has undertaken since the first consultation, in collaboration with a working group of GA community experts.
- 1.4 In keeping with our collaborative approach towards policy development and rulemaking, we reconvened the working group that assisted with the first phase of the project, enlarged its membership, and split by aircraft category to provide a focused analysis: aeroplanes, sailplanes, balloons and airships, helicopters, and gyroplanes.

Scope

- 1.5 This consultation proposes changes to private pilot licences and associated ratings and certificates to act as pilot in command of gyroplanes, as defined by BCAR section T as ‘a rotorcraft with a non-power-driven rotor rotating about an axis which is vertical, or nearly so, when the aircraft is in horizontal flight.
- 1.6 This project will not cover the following areas:
 - Commercial operations other than private pilot instruction. Pilot licences allowing commercial operations in aeroplanes, helicopters, and gyroplanes, including public transport and commercial air transport, as well as integrated

¹ See and [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/>

flight training with the express purpose of training from no previous experience to air transport licences are all outside the scope of this project.

- Private operations in complex aeroplanes and helicopters. Although operations in, for example, corporate aviation is technically part of the international general aviation definition, the specific characteristics and needs of the markets in which those aircraft operate mean that we regulate them separately.
- Ratings and rating exemptions for historic/ex-military aircraft, as well as display pilot qualifications.
- Unregulated activities to operate non-Part-21 gliders such as unregulated sailplanes and Self-Propelled Hang Gliders (also known as ‘paramotors’ or ‘powered paragliders’).

1.7 Note 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 will be necessary to implement the proposals.

Size of community

As of November 2023:

- 684 PPL(G) holders issued in accordance with ANO.
- 3 CPL(G) holders issued in accordance with ANO.
- 362 gyroplanes on the UK register.
- 2 Approved Training Organisation (ATO) offering theoretical and flight training for a CPL(G) licence and Flight Instructor (Restricted) (Gyroplanes).

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):

- Gyroplane flight crew licence holder or student
- Other GA aircraft flight crew licence holder or student eg PPL(BA), PPL(H), NPPL(A) etc
- Other aviation flight crew licence holder including instructor/examiner
- Other aviation licence holder, eg other aircrew, air traffic controller, aircraft maintenance etc
- Aircraft operator 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 this part of aviation, but have an interest in these issues

Is your response a formal submission on behalf of an organisation?

- No
- Yes: organisation: _____

Please note that in most cases, we would only expect only one formal submission to be made per organisation.

Chapter 2

Differences Training

- 2.1 Differences training is detailed in paragraph 2.10 in [Standards Document 44 \(SD44\)](#).
- 2.2 The requirements in this paragraph were originally written with existing single-seat pilots transitioning to a different single-seater in mind, not a newly qualified pilot transitioning on to their first single-seat type.
- 2.3 The table in SD44 is guidance to instructors showing the recommended gyroplane minimum differences training by hours when transitioning from tandem to side by side and to single seat. The group discussed whether this should be less discretionary. The group felt that the guidance listed within the table should be a minimum rather than a recommendation.
- 2.4 The group felt that we should modify paragraph 2.10 in SD44 to remove the discretionary aspect of the third sentence. This says, “The table below gives guidance to instructors and applicants on the suggested minimum amounts of differences training (in hours).”
- 2.5 The group believes this should say “The table below sets out the minimum amounts of differences training (in hours) that applicants should expect to complete and that more may be required to reach the necessary standard”.
- 2.6 Chapter 2 of Part 1 of [Schedule 8 ANO 2016](#) explains the privileges of the PPL(G), paragraph (1)(a) says that the pilot may fly as PIC of any gyroplane of a type or a class specified in the aircraft rating included in the licence.
- 2.7 Chapter 1 of Part 2 of Schedule 8 says that the rating endorsed entitles the licence holder to exercise those privileges associated with the rating.
- 2.8 We need to consider the rating endorsed in the licence. In paragraph 2.6 in SD44, refers to valid aircraft rating being only valid for the particular type of gyroplane that was used for the General Flight Test (GFT). In order to exercise privileges to fly another type of gyroplane an endorsement must be added to the personal flying log of the pilot.
- 2.9 The licence when issued, is endorsed with a Single Engine Gyroplane Class Rating. Although the guidance in SD44 is necessary and proportionate, there is no requirement to complete differences training in the ANO 2016.

- 2.10 [Article 153](#) says that the CAA can endorse any rating as detailed in Schedule 8 onto a PPL. The CAA can only endorse this rating if it is satisfied that the pilot is qualified by having the knowledge, experience, competence, skill, and physical and mental fitness to act in the capacity for the rating.
- 2.11 As there is no requirement in legislation, the guidance or means of compliance as per SD44, sets out the expectation the CAA has for achieving competence, this will always be considered a minimum amount of training for most pilots to achieve competence, some may take longer. In the event of a pilot who achieves competence in less time than the suggested minimum, the amounts of training specified in the table on page 24 of SD44 are not disproportionate.
- 2.12 There was a concern that this could lead to a shortage of instructors who can instruct on single-seat machines which could create a problem in future.
- 2.13 If such a shortage did occur, then this could be safely managed by communication with the CAA.
- 2.14 It should be recognised that differences training in homebuilt gyroplanes can be problematic if an instructor is not willing to fly the aircraft.
- 2.15 The CAA may be able to assist in finding an alternative solution, but we cannot direct an instructor or examiner to fly a particular aircraft to facilitate this for the owner.

Question			
Do you agree with our proposal that we should clarify the differences training requirements in paragraph 2.10 of Standards Document 44, to say:			
“The table below sets out the minimum amounts of differences training (in hours) that applicants should expect to complete and that more may be required to reach the necessary standard”.			
Yes	No	Undecided	No view/don't know

Question			
Do you agree with our proposal to incorporate the requirement for differences training in the ANO 2016, therefore making it mandatory?			
Yes	No	Undecided	No view/don't know

Chapter 3

Crediting for other categories

- 3.1 In this chapter we describe our thinking regarding crediting between categories, namely:
- Crediting the PPL(G) towards the gaining of another licence; and
 - Crediting other licences categories towards the gaining of a PPL(G).

A. Crediting the PPL(G) towards the gaining of another licence

Theoretical knowledge

- 3.2 Currently student pilots for the PPL(G), complete the same theoretical knowledge examinations as the NPPL(A) with Microlight Class Rating in the following subjects:
- Human Performance
 - Navigation
 - Meteorology
- 3.3 CAP804 (Reference only) did set out a credit for the holder of a PPL(G) towards gaining a NPPL(A) with Microlight Class Rating. As these are the same examinations, it seems reasonable to suggest that holders of a PPL(G) should be able to continue to take advantage of a credit towards the examinations for the NPPL(A) with Microlight Class Rating and any subsequent changes to the structure of the sub-ICAO pilots licences proposed in the other consultations.

Question

Do you agree that the credit towards the theoretical knowledge examinations previously offered in CAP804 should be available to PPL(G) holders gaining the NPPL(A) with Microlight Class Rating or future equivalent licence?

Yes

No

Undecided

No view/don't know

Flight training

- 3.4 CAP804 (reference only) also set out the crediting available to holders of a pilot's licence in one category of aircraft to gain a pilot's licence in another category of aircraft for licences issued in accordance with the ANO 2016.
- 3.5 Although CAP804 is for reference purposes only, it seems reasonable that holders of a PPL(G) should be able to continue to take advantage of a credit towards the flight training requirements towards gaining a NPPL(A).

- 3.6 We believe the credit for PPL(G) holders towards the NPPL(A) stated in CAP 804 (reference only) remains appropriate and will be formalised going forward.

We would also look to work with the working groups to ensure that any subsequent changes to the structure of the sub-ICAO pilots licences proposed in the other consultations, allows this credit to continue.

Question

Do you agree that the credit towards the flight training previously offered in CAP804 should be available to PPL(G) holders gaining the NPPL(A) with Microlight Class Rating or future equivalent licence?

Yes

No

Undecided

No view/don't know

B. Crediting other licences towards the gaining of a PPL(G)

- 3.7 CAP804 (reference only) and SD44 both include guidance on available credits towards meeting the theoretical knowledge and flight training and testing requirements for gaining a PPL(G) for holders of a pilot's licence issued by the CAA in another category of aircraft.

Theoretical knowledge

- 3.8 Paragraph 2.5 of SD44 states – where an applicant holds an existing current and valid pilot's licence where ground examinations of the theoretical subjects were required to obtain that licence and the standard of the ground examination was of an equivalent or higher level, the ground examination shall be credited with exception to the Gyroplane Technical examination. We are not proposing to amend this.

Flight training

- 3.9 Paragraph 2.5 of SD44 also covers the credit towards meeting the flight training requirement saying that - holders of a pilot's licence issued by the CAA in a different category of aircraft may be credited with up to a maximum of 15 hours dual flying experience towards the PPL(G) training requirements.
- 3.10 The requirements for the PPL(G), as set out in Paragraph 2.5 of SD44, are for a minimum of 40 hours of flight training which is made up of at least 15 hours as pilot under training (dual) and 10 hours of supervised solo.
- 3.11 The group considered a reduction in the minimum amount of supervised solo flight time compensated by an increase in the amount of pilot under training.
- 3.12 After further internal consideration it was agreed that this should be reviewed further incorporation with the group.

Question

Do you have any comments on the credits available to the holder of a pilot's licence issued by the CAA in another category of aircraft towards gaining a PPL(G)?

Chapter 4

Instructor supervision

- 4.1 Amend the requirement in the [ANO 2016](#) for the supervision of a restricted FI(G).
- 4.2 Section 3, Chapter 1, Part 2 of [Schedule 8](#) set out the privileges of other ratings or certificates. For all instructor certificates issued, the schedule sets out the need for supervision of the Restricted FI(G), this includes the need for the supervising instructor being present during the take-off and landing.
- 4.3 The gyroplane working group raised concerns about the burden this places on supervising instructors. However, the CAA has concerns about the quality of supervision of restricted instructors and have received reports from instructors and students who believe the supervision they have received has been insufficient.
- 4.4 We will not remove the requirement from the ANO 2016, but we are prepared to consult on the wording in Schedule 8, to see if some flexibility can be incorporated.
- 4.5 The current wording in Section 3, Chapter 1, Part 2 of Schedule 8, with respects to the supervision of restricted FI(G) says:
- (a) Such instruction must only be given –
- (i) under the supervision of a person present during the take-off and landing at the aerodrome at which the instruction is to begin and end.
- 4.6 We propose to request an amendment to the wording to say:
- (a) Such instruction must only be given –
- (i) under the supervision of a person present during the take-off and landing at the aerodrome or within the circuit pattern of the aerodrome or flying within the specified local flying area at which the instruction is to begin and end.
- Question**

Do you agree with an amendment to the wording in Section 3, Chapter 1, Part 2 of Schedule 8, with respects to the supervision of restricted FI(G)?

Yes
 No
 Undecided
 No view/don't know
- 4.7 The CAA will work with the gyroplane working group to help define the 'local flying area' in Appendix R of SD44.

Chapter 5

Maintaining privileges

- 5.1 Single Engine Gyroplane class rating validity period, revalidation and renewal requirements are currently similar to those of the aeroplane Single Engine Piston (SEP) Class Rating as set out in [Schedule 8](#) of the ANO 2016.
- 5.2 The current requirements are detailed in Table 3 of Chapter 1 to Part 3 of Schedule 8. This covers any single engine gyroplane which comes within the class rating, which has a validity period of 24 months.
- (a) 12 hours flight time in the relevant class within the 12 months preceding the expiry of the rating, including—
- (i) 6 hours as pilot in command;
 - (ii) 12 take-offs and landings; and
 - (iii) a one-hour flight with the holder of a Flight Instructor certificate (Gyroplanes); or
- (b) complete such proficiency check as the CAA may require.
- 5.3 As part of the aeroplane working group the revalidation requirements for the SEP Class rating were reviewed.
- 5.4 The gyroplane working group wanted to understand what the proposed options and consideration were with respects to the revalidation of the SEP Class Rating to see if it was appropriate to remain aligned.
- 5.5 The aeroplane working group explored two options which have been progressed to the consultation:
- a) Removal of the experience element from the revalidation requirements; and
 - b) Alignment of the experience requirements covering all SEP and similar Class Ratings.

Removing experience element from revalidation requirements

- 5.6 This option would remove the experience requirement, retain the requirement for refresher flight training with an instructor every two years.
- 5.7 It would maintain the requirements for a proficiency check with an examiner for the renewal of ratings that have passed their validity period, i.e. have lapsed; as would the requirement for long-lapsed holders to be referred to a training organisation.

Aligning experience/intervention requirements

- 5.8 The other option is retaining experience within the revalidation requirements, but simply aligning this across all aeroplanes (including microlight) and motorglider class ratings and for all licences, borrowing elements from all of the revalidation formats.
- 5.9 This would mean the revalidation requirements would be the same for all licence holders endorsed with any Microlight, SEP (Land and Sea), SSEA, SLMG and TMG Class Rating(s).
- 5.10 For both options above the CAA will be seeking to enhance the conduct of the dual refresher flight training by publishing detailed guidance on the areas that instructors should focus on when conducting this flight.

Single engine Gyroplane class rating

- 5.11 Following discussions within the gyroplane group, it was considered that the existing revalidation requirements do not constitute a disproportionate burden to the community, so we will not be proposing to amend the revalidation requirements for the single engine gyroplane class rating.
- 5.12 Paragraph 206 of SD44 explains that the FI(G) should make the purpose of the training flight clear at the outset. The function is to ascertain the applicant's knowledge and skills, interjecting if necessary to improve on these. If the primary purpose of the flight was for some other training, then the instructor must select suitable items of general handling and brief how these will fit into the profile for the purpose of maintaining the applicant's knowledge and skills. When the aims have been achieved the FI(G) will sign the applicant's logbook, append their licence number, and identify the "Training flight".
- 5.13 We are proposing to work with the gyroplane working group to set out guidance in SD44 for FI(G) on the areas that instructors should focus on when conducting the dual refresher training flight.

Question

Do you have any comments on the revalidation requirements for the single engine gyroplane class rating?

Yes

No

Do you have any comments?

Chapter 6

ATO requirement for FIC

- 6.1 The group discussed the proportionality of organisations needing an approval as a National Approved Training Organisation (ATO-N) to offer the Flight Instructor Course (FIC) and argued the potential to lessen the regulatory burden to align with the DTO system already in place for balloons and sailplanes.
- 6.2 [CAP1667](#) sets out the requirements for organisations seeking the ATO-N, and that this approval is necessary to offer flight and theoretical knowledge training for the FIC and the CPL(G) courses.
- 6.3 The working group considered the following aspects of ATO-N to be disproportionate:
- Nomination and approval of key post holders for Accountable Manager, Head of Training, Safety Manager and Compliance Manager. In addition, if applicable the Chief Theoretical Knowledge Instructor;
 - Operations, Training, Safety Management and Compliance Monitoring Manual(s); and
 - Requirement for a Safety Management System, which is documented in the Safety Management Manual.
- 6.4 An alternative might be to allow the FIC to be delivered by a Declared Training Organisation (DTO), similar to what is currently allowed of balloon and sailplane flight instructor training.
- 6.5 When considering the DTO requirements, the three areas described above are covered within the requirements but in a different way.

Nomination of post-holders

- 6.6 DTOs must nominate the Responsible Representative and the Head of Training, but these do not need to be approved by the CAA. Guidance is published setting out the anticipated qualification and experience expected of the Head of Training.

Operations, training, and compliance monitoring

- 6.7 DTOs must follow an approved training programme, but do not need to establish Operations, Training, Safety Management and Compliance Monitoring Manual(s).

- 6.8 DTOs may decide to develop a manual or a series of procedures to set out how flight and theoretical training will be delivered.

Safety Management

- 6.9 DTOs do not need to have a Safety Management System, instead they must develop and publish a safety policy, the purpose of which is to set out the safety goals for the training organisation and the means for achieving and tracking the progress to these goals.
- 6.10 DTO are required to conduct an annual internal review and activity report, which is an assessment of the effectiveness of the training organisation carrying out the tasks and responsibilities, with special emphasis on:
- a) Assessment of the safety policy including the effectiveness of the implementation of any mitigations in relation to identified safety hazards.
 - b) Confirmation that flight and theoretical knowledge training has been delivered in accordance with the requirements and to the necessary standard.
 - c) Checks on documentation to ensure compliance with the applicable regulations this includes training records, instructor and examiner records, remedial action to non-compliances identified, suitability of facilities and availability of sufficient resources.
 - d) Checks on the suitability and airworthiness of training aircraft used for flight training. This includes checks on maintenance records and aircraft documents.
 - e) Maintenance of training standards, by monitoring feedback from students and student progress through training courses. Maintaining records of theoretical knowledge examination and Flight Test results to identify any trends.
- 6.11 DTO are also required to develop a simple means for recording and tracking occurrence reports, both mandatory and voluntary, filed in relation to the aircraft operated by the training organisation. Although not a requirement, DTO are also encouraged to develop an internal safety reporting system and develop procedures to ensure that the principle of 'just culture', is used when considering any reports submitted.

Question

Do you agree with our proposal to amend CAP1667, to develop requirements similar to the DTO for training organisations offering Flight Instructor Course for Gyroplanes?

Yes

No

Undecided

No view/don't know

Chapter 7

PPL Exams

- 7.1 The group reviewed the current theoretical knowledge examination questions, structure, and rules for the PPL(G) and propose the following changes.
- 7.2 As already mentioned in paragraph 3.3 of this consultation, student pilots for the PPL(G), complete the same theoretical knowledge examinations as the NPPL(A) with Microlight Class Rating in the following subjects:
- Human Performance
 - Navigation
 - Meteorology
- 7.3 In addition, a Gyroplane Aviation Law, Flight Rules and Procedures and a Gyroplane Technical paper.
- 7.4 The NPPL(A) with Microlight Class Rating theoretical knowledge examinations were updated in 2020 and a further update is to be published in 2024.
- 7.5 Currently, Gyroplane Ground Examiners are using the older version of NPPL(A) examination papers, and a Gyroplane Aviation Law, Flight Rules and Procedures and a Gyroplane Technical paper updated in 2018.
- 7.6 The working group considered that it might be more appropriate for the PPL(G), to have their own theoretical knowledge examinations covering all subjects.
- 7.7 This may require CAA to work with the working group to amend the PPL(G) theoretical knowledge syllabus in SD44.

Question

Do you agree that the PPL(G) should have their own set of theoretical knowledge examination papers for all subjects?

Yes

No

Undecided

No view/don't know

- 7.8 We have a stated objective to move more services on to a digital format, this is further supported by the Government review of public bodies, which made recommendation in 2023 to the CAA to move more services online.
- 7.9 We are encouraging all theoretical knowledge examinations to be conducted online. We are proposing to bring the examinations for the PPL(G) into the eExam system.

- 7.10 The main benefit for us is we can update the question bank more easily when legislation changes or an examination question is identified as being incorrect or ambiguous.
- 7.11 We can also monitor and identify trends in the progress of candidates through the examinations. We have also seen a marked reduction in the reports of examination candidate malpractice when completing the examinations when compared to the paper system.
- 7.12 The main benefit for the Ground Examiners is they no longer need to retain the records and the examination papers.
- 7.13 Ground Examiners can also access data about how their students are progressing through the examinations.
- 7.14 The main disbenefit for examination candidates is that we charge a fee when conducting the examination(s).

Question

Do you agree that the PPL(G) theoretical knowledge examinations are incorporated and delivered through the eExam system?

Yes

No

Undecided

No view/don't know

Chapter 8

Further clarifications

Flight Radio Telephony Operators Licence

- 8.1 The working group considered the development of a Flight Radio Telephony Operators Licence (FRTOL) specific for recreational aviation. The current syllabus and training requirements for the CAA-issued FRTOL are set in [CAP 2118](#) and the standards are set in [CAP 2325](#). Guidance regarding GA-specific radio procedures and terminology is also available in the [Skyway Code](#) and a Safety Sense Leaflet ([SSL 22](#)).
- 8.2 Following a review and amendment of these standards in 2021, we will conduct a post implementation review in 2025 and this could include consideration for creating a subset of the FRTOL applicable for sailplanes, balloons, and gyroplanes.

Medical requirements for CPL(G)

- 8.3 Although not specifically within the scope of the GA Pilot Licensing and Training Simplification review, the working group considered the requirement for the CPL(G) to hold a valid Class 1 Medical Certificate.
- 8.4 SD44 says in paragraph 4.2 that the applicant for a CPL(G) must hold a valid Class 1 Medical Certificate.
- 8.5 [Article 152\(1\)](#) of the ANO 2016 sets out that the CAA must grant a licence to an applicant if they satisfy the specified requirements:
- a) A fit person to hold the licence; and
 - b) Qualified by having the knowledge, experience, competence, skill, and physical and mental fitness to act in the capacity to which the licence relates.
- 8.6 Paragraph (2) further requires that for the purposes of paragraph (1) the applicant must supply such evidence and undergo such assessments, examinations, and tests (including in particular medical assessments and examinations) and undertake such courses of training as the CAA or a person approved by the CAA for that purpose may require.
- 8.7 [Article 160](#) sets out the requirement for a medical certificate and says that subject to [Article 163](#), which is the provision allowing a pilot to make a medical declaration, the holder of a licence is not entitled to perform any of the functions to which the licence relates unless they hold a valid medical certificate.

- 8.8 [Article 161](#) sets out the issue of a medical certificate, saying that every applicant for, or holder of, a licence under [Article 152](#) must, whenever the CAA requires, submit to a medical assessment or examination by a person approved by the CAA.
- 8.9 As already mentioned, [Article 163](#) sets out the provision allowing a pilot to make a medical declaration. Paragraph (1) specifies the holder of certain licences can take advantage of the medical declaration. Those being:
- a) National Private Pilot's Licence (NPPL),
 - b) PPL,
 - c) CPL(Balloons) that is restricted to commercial operations and PPL (Balloons and Airships).
- 8.10 Paragraph (2) goes further by saying the holder of a specified licence, or of a licence which includes the privileges of a specified licence, may exercise any of the privileges of the licence, if the holder has a medical certificate or has made a pilot medical declaration.
- 8.11 This means that the holder of a CPL(G) exercising the privileges of a PPL(G), even if this includes the delivery of Flight Instruction for the gaining of a PPL(G), can do so having made a Pilot Medical Declaration. This will require an amendment to SD44.
- 8.12 As the ANO 2016 does not specifically state what class of medical certificate is required for the issue of a licence, the current policy as set in Standards Document 44 requiring a Class 1 Medical Certificate for the issue of a CPL(G) remains applicable and we are not seeking to change this.

APPENDIX A**Abbreviations**

ANO	Air Navigation Order 2016
ATO-N	Approved Training Organisation in accordance with the ANO 2016
CAP	Civil Aviation Publication
DTO	Declared Training Organisation
FCL	Flight Crew Licensing
FIC	Flight Instructor Course
FRTOL	Flight Radio Telephony Operators Licence
GA	General Aviation
ICAO	International Civil Aviation Organisation
IMC/IR(R)	Instrument Meteorological Conditions or Instrument Rating (Restricted) rating
LAPL	Light Aircraft Pilot Licence
NPPL	National Private Pilot Licence
PMD	Pilot Medical Declaration
PPL	Private Pilot Licence: can be issued for an Aeroplane (A), Helicopter (H), Balloons & Airships (BA) or Gyroplane (G)
SARPs	Standards & Recommended Practices (ICAO Annexes)
SD44	Standards Document 44
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

