

# General Aviation Pilot Licensing Review Phase 2: Balloons

Consultation Response Document

CAP3032B



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# Summary

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This paper sets out the findings from the consultation on the second phase of the Licensing and Training Simplification project – Balloons and sets out key decisions to proceed with in the next phase of the project.

The consultation ran between 13 March 2024 and 22 May 2024 and elicited 128 unique formal responses.

## Overall direction

We will be progressing most of our proposals included in the consultation. The relevant changes to Part-BFCL and the Air Navigation Order 2016 have been incorporated into an Opinion and Instruction Document (OID), which has now been submitted to the Department for Transport for legal review.

## Next steps

The Department for Transport will review our OID and put forward legislation as appropriate for enactment, currently planned for the spring of 2025.

There will be a further consultation later in the year on associated Acceptable Means of Compliance (AMC), Guidance Material (GM) and other supporting CAA publications relevant to rule changes.

There will also be a process to ensure that our systems, internal instructions documents and staff are ready for the implementation of these changes.

Due to the volume of work and resource constraints in the legislative programme, some areas of policy relating to theoretical knowledge procedures and validity periods will not be progressed until 2025, with possible legislation in 2026.

## Chapter 1

# Background, scope and approach

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## Purpose of this document

- 1.1 We published [CAP2974B](#) from 13 March 2024 to 22 May 2024 to consult on the second phase of the Licensing and training simplification project with respect to changes for balloons.
- 1.2 We received a total of 128 responses to this consultation. Most respondents answered the survey questions and many left additional comments. The consultation questions were worded in such a way to form a survey that could be quantitatively analysed.
- 1.3 The results of this consultation set out the direction for the next phase of this project and the changes that will be implemented. At several points in this Comment Response Document (CRD), we set out specific decisions arising from the consultation regarding proceeding with the next phase of this project.

## Background

- 1.4 The CAA continued throughout 2023 with the project to simplify General Aviation (GA) flight crew licensing and training. [CAP2974B](#) consulted on the detailed proposals for balloons and airships. Similar consultations were also undertaken for aeroplanes, sailplanes, gyroplanes, and helicopters.
- 1.5 This work followed an earlier consultation [CAP 2335](#) in Autumn 2022. The 1,246 GA community responses<sup>1</sup> (summarised in [CAP 2532](#)) showed strong support in several key areas for updating our current legislation with regards to licensing and training.
- 1.6 This second consultation explored 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.
- 1.7 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.

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<sup>1</sup> 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/>

## About the balloon consultation response

- 1.8 The balloon consultation was conducted over 10 weeks from 15 March to 22 May 2024 and received 128 responses. The vast majority (95%) of respondents described themselves as balloon pilots, selecting the 'balloon flight crew licence holder or student', with 11 respondents selecting 'other GA flight crew licence holder or student'.
- 1.9 The 122 respondents to the 'balloon flight crew licence holder or student' question were asked to indicate their highest level of licence attained (whether valid or not), and the responses were as follows:
- Balloon student pilot: 10
  - Private balloon licence holder such as PPL(BA) or BPL: 67
  - Commercial balloon licence/rating holder: 52
  - Balloon instructor: 35
  - Balloon examiner: 14

## Chapter 2

# Balloon regulation implementation

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2.1 We opened the consultation with describing how the balloon licensing project fits in with the wider approach of implementing the assimilated UK Regulation (EU) 2018/395 on Balloon Operations and Flight Crew Licensing (hereafter ‘the Balloon Regulation’), particularly its Annex III on Balloon Flight Crew Licensing (Part-BFCL). This project coordinates with our separate work to implement that Balloon Regulation which was enacted into UK law in March 2020 before the UK departed from the European Union, and before this licensing project began. This chapter covers the following topics:

- Deeming valid existing licences for Part-21 ballooning
- Existing PPL(BA)s for non-Part-21 ballooning
- Remaining existing licences and privileges
- New licence issues

## Deeming valid existing licences for Part-21 ballooning

2.2 We described in the consultation our approach on ‘deeming’ licences issued under the Air Navigation Order 2016 (ANO) as valid as the Balloon Pilot Licence (BPL) under the Balloon Regulation to operate Part-21 balloons.

2.3 We stated that it was not our intention to deem valid the Private Pilot Licence for Balloons and Airships [PPL(BA)] or the Commercial Pilot Licence for Balloons [CPL(B)] and those licences would have to convert to the BPL with appropriate ratings by the deadline. Among our reasons for this, we stated that doing so would be unfair on the numbers of PPL(BA)s that have already converted to the BPL.

## We asked

2.4 Although we did not consult in the Phase 2 consultation on repealing Part-BFCL or changing the licence architecture, we asked for comments on our approach to deeming valid and the conversion process.

## You said

2.5 We received a significant number of comments to these points. Many questioning the overall approach to implementing the Balloon Regulation, calling for us to revoke Part-BFCL and revert to the ANO licences. We also received many consultation responses calling for us to ‘deem valid’ existing PPL(BA)s, rather than force them to convert by the deadline. Of the 125 unique responses, we received 78 comments (62% overall) calling for the retention or deeming valid of the PPL(BA), of which 58 specifically asked for us to deem valid the PPL(BA) as the BPL.



## We did

- 2.6 In relation to revoking Part-BFCL and reverting to the ANO licences, we explained in the consultation why we are not doing this, and we will continue to proceed with the implementation of Part-BFCL.
- 2.7 Nevertheless, the feedback received to the consultation regarding ‘deeming’ of existing PPL(BA) has prompted us to reconsider our view, and we have determined that existing licence holders may continue to exercise privileges as pilot in command (PIC) on Part 21 balloons, subject to the following limitations:
- Private operations only; and
  - Balloons of hot-air size group A only (envelope capacity up to 3,400m<sup>3</sup>).
- 2.8 We understand there to be a low safety risk regarding private balloon flying in these balloons as opposed to commercial operations and/or larger balloons. There is a low likelihood of fatal or serious injury accidents, and the severity of such accidents on second-parties or uninvolved third parties is regarded as minimal.

## Commercial operations including instructing and examining

- 2.9 We are not prepared to deem valid the CPL(B) or instructor/examiner ratings or certificates. Commercial ballooning operations carry a markedly different risk profile in terms of likelihood and severity especially to second parties and uninvolved third parties, so we cannot apply the same approach as we can apply to private ballooning.
- 2.10 This project has aimed to address concerns raised about Part-BFCL in a manner that balances risk and proportionality, particularly in the areas of commercial operations and instructing and examining, and we have determined that the outcomes of this consultation and next steps will achieve that.
- 2.11 Commercial ballooning also has other strands of regulation covered in the Balloon Regulation, including Declared Balloon Operators and Declared Training Organisations. Trying to disaggregate those would introduce complexities of having to map those across different regulatory regimes.
- 2.12 ANO licence holders (PPL(BA) and CPL(B)) wishing to exercise privileges after 30 September 2025 in Part 21 balloons involved in commercial operations, including instructing and examining, must convert their licences to the equivalent BPL and applicable ratings.

## Larger balloons

- 2.13 We are not prepared to allow PPL(BA) licences to be used for private operations in balloons of hot-air size group B or above. Most private and sport ballooning in the UK takes place in the smallest group size, so most pilots should not be affected by this limitation.

- 2.14 We are also concerned that since the ANO requirements were introduced in the 1970s, balloons have become larger, capable of carrying more passengers, and have notable handling differences. This is reflected in Part-BFCL of group progression and recency requirements, which are all designed so that pilots must demonstrate the safe handling of the larger group sizes, and continue to practice this over time.
- 2.15 BFCL.150 sets out the requirements including instructor intervention for progression to larger hot-air group sizes, and BFCL.160 for recency in those larger balloons. Limiting to this hot-air size group A would align with those, so that PPL(BA) would be level with the entry-level BPL.
- 2.16 Therefore, PPL(BA) holders wishing to exercise privileges as PIC in private operations in Part-21 balloons of hot-air group size B or above after 30 September 2025, must have converted to the BPL by that deadline.

### **Phase 2 Balloon consultation outcome – CAA Decision no.1:**

**PPL(BA) licences issued under the ANO will be deemed valid under the Balloon Regulation, allowing holders to exercise privileges as Pilot-in-Command (PIC) of private ballooning operations only and in Part-21 balloons up to hot-air group size A (envelope capacity up to 3,400m<sup>3</sup>).**

- 2.17 To deliver this, we will recommend to the Department for Transport (DfT) to amend Balloon Regulation article 3b so that the PPL(BA) issued in accordance with the ANO is deemed to comply with that regulation where:
- It remains valid in accordance with the ANO; and
  - It is used within the privileges of that licence in accordance with ANO Schedule 8, Part 1, Chapter 2, Section 3.
- 2.18 We will also amend the ANO entry for the Private Pilot Licence (Balloons and Airships) in ANO Schedule 8, Part 1, Chapter 2, Section 3 to remove references to any commercial or public transport operations in the licence privileges, and to reflect the hot-air envelope capacity limit in the privilege limitations.
- 2.19 Those PPL(BA) holders who have already converted to the BPL will not have done so without benefit. As a BPL holder, they will be able to:
- Qualify to act as PIC of balloons of hot-air size Group B and above;
  - Qualify for commercial operations including commercial passenger ballooning
  - Qualify for instruction/examiner privileges; and
  - Credit any flight instruction done for student PPL(BA)s towards a restricted privileges instructor, as explained in more detail in the next chapter.

2.20 In terms of recency requirements, we will be changing the refresher training requirements for PPL(BA)s under ANO Schedule 8, as described in the next chapter.

### **Full conversion report to BPL valid only until 30 September 2025**

2.21 Until the implementation deadline of the Balloon Regulation on 30 September 2025, PPL(BA) holders can apply to us for conversion to the BPL. These conversions are being undertaken on the basis of our conversion and credit report allowing the full and complete crediting of all experience and testing towards the issue of that licence, pursuant to Balloon Regulation article 3b(3).

2.22 However, maintaining this full conversion process beyond that deadline would be administratively unjustifiable on our systems, procedures and staff training.

2.23 Our full conversion and credit report will cease to be in force after that deadline. From that point, any PPL(BA) holder wishing to convert to the BPL will be credited using BFCL.035:

“Applicants for a BPL or an associated privilege, rating or certificate shall be fully credited with all solo, dual instruction or PIC flight time on balloons towards the requirement of a total flight time for the licence, privilege, rating or certificate.”

### **Phase 2 Balloon consultation outcome – CAA Decision no.2:**

**After 30 September 2025 we will discontinue the conversion and credit report for PPL(BA) holders.**

## **PPL(BA) for non-Part 21 ballooning**

### **We asked**

2.24 We described our intention to allow existing PPL(BA) holders to fly non-Part-21 balloons indefinitely. The consultation included a question ‘What are your views towards our approach of maintaining indefinitely PPL(BA)s already issued for flying Non-Part-21 balloons?’.

### **You said**

2.25 Most respondents were in favour of this proposal:

<b>Option</b>	<b>Total</b>	<b>Percent</b>
Fully support this approach	100	78.1%
Against: all licences should convert to BPL by the deadline	15	11.7%
Undecided	5	3.9%

Not familiar enough with issue to comment or have a view	4	3.1%
Not answered	4	3.1%

**We did**

2.26 We will proceed with maintaining indefinitely existing ANO PPL(BA)s to exercise privileges in non-Part-21 balloons. This includes the PPL(BA)s themselves as well as CPL(B)s whose holders can exercise privileges as a PPL(BA) for non-commercial operations. This is because commercial operations can only take place in certificated balloons, virtually all of which are Part-21 balloons, and therefore in accordance with the Balloon Regulation.

**Phase 2 Balloon consultation outcome – CAA Decision no.3:**

**Privileges will remain indefinitely for existing PPL(BA) holders to exercise privileges as pilot-in-command of private ballooning operations on non-Part 21 balloons.**

**Remaining licences and privileges**

2.27 Please note that holders of ANO balloon or airship licences outside the scope of the above sections must convert to a BPL if they wish to exercise privileges as PIC of Part-21 balloons after 30 September 2025. This applies to pilots looking to act as PIC of balloons in the following activities:

- Commercial operations of any sort in balloons of any class or size;
- Any form of instructing or examining in balloons of any class or size; or
- Private operations in Part 21 hot-air balloon group B or above (ie envelope size above 3,400m<sup>3</sup>).

2.28 We reiterate the points we made in the consultation encouraging holders looking to exercise privileges in these areas to convert as soon as possible and well ahead of the September 2025 deadline. The licence conversion process has been under way since the Balloon Regulation was enacted in 2020. By September 2025, ANO licence holders will have had 5 years to operate Part 21 balloons with their existing licences. We think this has given the community ample time to convert their licences.

2.29 Converting early mitigates pressures such as those related to flying duties during that time of year and avoids any processing or administrative delays. As the deadline draws nearer, particularly from mid-2025, we will not be able to guarantee processing applications in time for the deadline, and we will not take responsibility for any gaps in privileges caused by any processing delays.

## New licence issues and training

### We asked

2.30 After explaining our intention to cease issuing new PPL(BA)s from 30<sup>th</sup> September 2025, we gauged views in the consultation, asking specifically ‘What are your views towards us ceasing to issue new PPL(BA)s with effect from September 2025 given the complications described in Chapter 3?’

### You said

2.31 The consultation returned a majority opposed to this approach:

Option	Total	Percent
Agree with this approach	25	19.5%
Disagree	81	63.3%
Neither, I think all licences should convert to BPL by the deadline	13	10.2%
Undecided	3	2.3%
No view/don't know	1	<1%
Not answered	5	3.9%

2.32 Comments included returning to the ANO licences, the fact that training in Annex I [non-Part 21] balloons has already been ongoing for some time, and questioning the complications described in the consultation.

### We did

2.33 We accept the continued existence of active PPL(BA)s for the life of holders who only wish to fly privately, in line with what we have done in other GA aircraft categories. We also explained in the consultation that BPL holders can already exercise privileges in non-Part 21 balloons. Therefore, we cannot justify the continued issuing of two different licences with overlapping privileges in private ballooning, as doing so would run contrary to the simplification objectives of this project, introduce potential confusion, and pose an administrative burden on the CAA and the community.

#### **Phase 2 Balloon consultation outcome – CAA Decision no.4:**

**No new PPL(BA)s or CPL(B)s will be issued after 30 September 2025.**

2.34 To implement this, we will recommend to DfT to amend ANO article 172 to cease issuing those licences from that date.

## Chapter 3

# Licensing for private ballooning

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3.1 The consultation described various reforms we have suggested of the requirements for the base Balloon Pilot Licence (BPL) as set out in Part-BFCL. Of particular focus is ensuring that the requirements reflect best practices for the UK when this is implemented as the single balloon licence for Part-21 balloons. The specific topics were as follows:

- BPL training course instruction arrangements
- BPL training organisation requirements
- Hot-air balloon tethered flights training
- Recency requirements – BPL and PPL(BA)

## **BPL training course instruction arrangements**

### **We asked**

- 3.2 We explained our interests in modifying the BPL training course to reduce the number of dual flight training hours to reflect the limited availability of fully qualified FI(B)s in the market.
- 3.3 We proposed in the consultation introducing an Assistant Instructor authorisation whereby any experienced BPL holder with at least 50 hours of experience could undergo a basic ground training course on instruction (modelled on the existing teaching and learning core course that instructors must pass) and attain an Assistant Instructor authorisation which would be a logbook endorsement rather than a rating.
- 3.4 We explained that would allow us to amend the BPL training course so that just four hours plus the solo flying would have to be supervised by the FI(B), allowing the rest of dual flight instruction to be performed by Assistant Instructors.
- 3.5 We asked: ‘Do you support our suggestion of introducing an authorisation tentatively termed “Assistant Instructor”, and changing the minimum required number of dual instruction flights and hours to be undertaken with a FI(B) to at least 4 hours and 4 flights (instead of 12 hours)?’ The consultation question was worded as it was because reducing the number of required FI(B) hours in the BPL training course was inseparable from the Assistant Instructor proposal.

## You said

3.6 We received 123 responses to this question summarised as follows:

Option	Total	Percent
Yes	85	66.4%
No	27	21.1%
Undecided	6	5.0%
No view/don't know	5	3.9%
Not answered	3	3.9%

3.7 Although these overall numbers supported our proposal, 73 of the 89 comments received specifically opposed the Assistant Instructor idea. Taken together with the 'no' respondents who did not leave a comment, it reveals that the Assistant Instructor suggestion was opposed by 77% of all respondents.

3.8 Many argued that the PPL(BA) system under CAP 804 worked well whereby any experienced balloon licence holder was allowed to supervise, and a few even suggested that experienced balloon pilots should be allowed to supervise the entire course, including the solo flying.

## We did

3.9 This consultation feedback has prompted us to re-examine and revise our approach to the BPL training course. We have explored light-touch alternatives to the Assistant Instructor proposal, to mirror as much as possible the former CAP 804 requirement allowing a proportion of the dual flight training to be conducted by individuals who are not fully qualified instructors.

3.10 Our conclusion is to credit PPL(BA) holders as instructors with restricted privileges, if they can demonstrate evidence of student dual training experience:

- PPL(BA) holders converting to the BPL who can demonstrate such evidence would be issued with an FI(B) certificate with the restricted privileges. This would be done based on a conversion and credit report, not the applicable regulation.
- The restricted privileges would be 'dual flight instruction for the initial issue of a BPL only'. They would not be able to supervise solo flying, dual training for other ratings or certificates, or refresher training. More details of the FI(B) with restricted privileges are set out in the instructors and examiners chapter below.

3.11 This measure would allow us to relax the BPL training course requirements in BFCL.130 so that such FI(B)s with restricted privileges may undertake part of the 12

hours of dual flight training, thus mirroring the approach in the PPL(BA) training course.

3.12 All solo training and at least four hours of the dual flight training towards the BPL will have to be supervised by a current and unrestricted FI(B). This is to ensure the appropriate delivery of training standards in accordance with our Basic Regulation and ICAO obligations.

3.13 We believe this approach achieves several benefits:

- Heeding the negative consultation feedback about the Assistant Instructor proposal;
- Pursuing a solution that allows supervision of some of the BPL course by persons other than fully qualified FI(B)s;
- Providing a pathway for experienced private pilots who have conducted such dual instruction to sample and consider gaining a full balloon instructor qualification if they wish. This principle underpins the Assistant Instructor idea, and it could help to increase the number of instructors in the sport; and
- Presenting an opportunity in a subsequent wave of GA licensing reforms to consult on introducing into the regulations a more formal FI(B) certificate with restricted privileges, along the lines of the approach used for aeroplane instructors in Aircrew Regulation FCL.910. This would allow new BPL holders who have amassed sufficient experience to be able to conduct dual flight supervision of student BPLs.

#### **Phase 2 Balloon consultation outcome – CAA Decision no.5:**

**PPL(BA) licence holders converting to the BPL by 30 September 2025, who present logbook evidence of previously supervising PPL(BA) students, may be issued with a Flight Instructor for Balloons certificate with restricted privileges and bearing the remark ‘dual flight instruction for the initial issue of a BPL only’.**

3.14 We will deliver this by recommending to DfT to amend the existing PPL(BA) to BPL conversion and credit report. Any PPL(BA) who has already converted to the BPL who wishes to take advantage of this decision (e.g. is not already a full instructor or examiner) would be invited to apply to us again.

#### **Phase 2 Balloon consultation outcome – CAA Decision no.6:**

**The CAA will alleviate the dual flight training requirements in BFCL.130 so that holders of an unrestricted and valid FI(B) certificate must supervise 4 hours of BPL dual flight training and the solo flight, while holders of a valid FI(B) certificate with restricted privileges may supervise the remainder.**

3.15 We believe the best way to deliver this is by publishing a new Acceptable Means of Compliance (AMC) to BFCL.130 that could be drafted as follows:



**Applicable regulation**

**BFCL.130 BPL – Training course and experience requirements**

(b) at least 16 hours of flight instruction in either hot-air balloons that represent group A of that class, or gas balloons, including at least:

- (1) 12 hours of dual flight instruction;
- (2) 10 inflations and 20 take-offs and landings; and
- (3) One supervised solo flight with a flight time of at least 30 minutes.

**Proposed AMC1**

**[New] AMC1 BFCL.130(b) BPL – Training course and experience requirements**

1. Of the 12 hours of dual flight instruction referred to in BFCL.130(b)(1):
  - a) at least 4 hours should only be supervised by a person holding a valid FI(B) issued in accordance with BFCL.315(a), and
  - b) the remainder may be supervised by a person holding a valid FI(B) with restricted privileges issued by the CAA in accordance with a conversion report.
2. The supervised solo flight referred to in BFCL.130(b)(3) should only be supervised by a person holding a valid FI(B) issued in accordance with BFCL.315(a).

**BPL training organisation requirements**

3.16 We proposed in the consultation to make optional the requirement for the private BPL training course to be delivered by an ATO or DTO, in favour of leaving this to an instructor to directly supervise. As an alternative, we suggested leaving the ATO/DTO requirement unchanged in favour of exploring in the future how the DTO regime could be especially tailored to the unique needs of the balloon sector.

**We asked**

3.17 We consulted on removing the requirement for an ATO/DTO for Part-BFCL private ballooning and introducing the option of FI(B)s supervising the training themselves. We asked: ‘Do you support our suggestion of removing the ATO/DTO requirement for training for a base BPL?’, offering respondents the choice between accepting this, leaving the requirements unchanged, or the alternative of exploring future alleviations in a future DTO review.

**You said**

3.18 This proposal to make optional the DTO was strongly supported from respondents:

Option	Total	Percent
Yes: remove the ATO/DTO requirements from base BPL training	79	61.7%

No: Leave the ATO/DTO requirement unchanged, but explore alleviations for ballooning in the future DTO review	26	20.3%
No: leave the regulations unchanged	13	10.2%
Undecided	8	6.3%
No view/don't know	0	0
Not answered	2	1.6%

3.19 We analysed the responses by answers to an earlier question about type of respondent. Of the 39 instructors and examiners who answered this question, 27 supported removing the ATO/DTO requirement, 9 favoured the future DTO review, and 3 were spread among the other options. We are sufficiently confident that this proposal is supported by the community at large, and those who would be particularly affected.

3.20 Comments varied from strongly welcoming this proposal believing that the DTO for ab initio BPL training is unnecessary; while the majority stressed that the DTO regime is misaligned with the needs of ballooning and should never have been applied, with many arguing that the British Balloon & Airship Club (BBAC) processes should be somehow replicated.

3.21 We did get a few comments questioning our drafting suggestion to remove references to the ATO/DTO in relation to BPL training, arguing that this could leave no training organisation accountability for balloons which was regarded as essential.

### We did

3.22 We will proceed with the proposal to remove the requirement, but instead make it optional if organisations wish to apply for DTO status. We think that for BPL training for private ballooning, the existing FI(B) requirements provide a sufficient accountability and oversight basis to ensure the adequate delivery of training.

3.23 We also considered the suggestion of allowing the BBAC to continue to act on behalf of instructors by undertaking training administration and concluded that the existing processes can accommodate this. The BBAC (and any other organisation) already has three options:

- Continue to perform training records functions on behalf of instructors as they are doing now. The Flight Instructor would maintain overall accountability on all aspects of training, including these records;
- The BBAC or any other organisation could apply for DTO status if they wish; or
- The BBAC or any other organisation could apply for approval as a Qualified Entity in accordance with Basic Regulation Article 69 and Annex VI, which would

allow them to oversee on our behalf many aspects of balloon pilot training including the submitting of recommendations to the CAA for the issue of a BPL, additional classes, groups, ratings or certificates.

**Phase 2 Balloon consultation outcome – CAA Decision no.7:**

**The ATO/DTO requirement for training towards the issue of the BPL will become optional – the training may be overseen directly by the FI(B).**

3.24 We intend to deliver this by recommending to DfT to amend the first paragraph of BFCL.130 so that the BPL training course can be delivered either by an ATO, DTO or under the supervision of an FI(B).

**Licensing for hot-air tethered flight**

3.25 We proposed to simplify the hot-air tethering requirements by:

- Deleting the existing tethering rating described in BFCL.200; and
- Embedding the tethering requirements into the base BPL licence.

**We asked**

3.26 We asked the community their views towards this proposal, specifically ‘Do you agree with our approach of deleting the existing tethering rating from the licensing regulations and instead embedding tethering into the base BPL licence requirements?’

**You said**

3.27 The proposal was strongly supported in the consultation, by a sizeable majority of those parts of the community most affected by this proposal:

Option	Total	Percent
Yes	113	88.2%
No	10	7.8%
Undecided	2	1.6%
No view/don't know	1	<1%
Not answered	2	1.6%

3.28 37 of the 39 instructor and examiner respondents supported this as well.

**We did**

3.29 We will proceed with this amendment as consulted.

**Phase 2 Balloon consultation outcome – CAA Decision no.8:**

**The existing separate tethering rating in the BFCL regulations will be deleted. The required training will instead be embedded into the BPL training course.**

3.30 We will deliver this by recommending to DfT to delete the content at BFCL.200 and adding the experience and training requirement into the BPL training course at BFCL.130. The syllabus at GM1 BFCL.200 and AMC1 BFCL.200(b)(2) would be incorporated into AMC2 BFCL.130(c) and GM1 BFCL.130(c) accordingly.

### Recency requirements – BPL and PPL(BA)

3.31 We proposed in the consultation reviewing the recency requirements for the BPL in BFCL.160, as well as for the PPL(BA) given its continuation. Specifically, we covered:

- Flight experience element – potentially removing this from the BPL;
- Refresher training for both the BPL and introducing this for the PPL(BA); and
- Recency requirements for additional classes of balloons.

### Flight experience

#### We asked

3.32 We had made a late-stage suggestion in the consultation of removing the experience element of the recency requirements and, if we did this, increasing the frequency of the FI(B) refresher training. This was in line with what we had suggested in the other GA licensing consultations.

#### You said

3.33 There was an overwhelming response against removing the experience element and increasing the refresher training frequency, and we received many comments arguing that the ANO requirements for the PPL(BA) worked very well and should be reverted to.

3.34 In terms of removing the experience element, we asked ‘Do you agree with our proposal to remove the experience element of the recency requirements for the base BPL, so that the holder only need undergo a training flight with an FI(B)?’ and a majority of the respondents opposed this suggestion:

Option	Total	Percent
Yes	18	14.1%
No	101	78.9%
Undecided	4	3.2%
No view/don't know	2	1.6%
Not answered	3	2.3%

3.35 In terms of increasing the frequency of the refresher training, we asked ‘do you agree with our view that if we removed the experience element from the base BPL recency

requirements, we would have to increase the frequency of the FI(B) training flight from 48 months to 24 months?’ and similarly there was widespread opposition:

Option	Total	Percent
Yes	17	13.3%
No	102	79.7%
Undecided	3	2.3%
No view/don't know	4	3.1%
Not answered	2	1.6%

3.36 Of the comments received, many argued that the PPL(BA) experience requirements are sufficient and workable, and removing this would impact safety. However, we received several detailed comments suggesting that the current 6 hours and 5 take-offs and landings in 24 months is not really workable in a ballooning context compared to the 5 flights of minimum 5 minutes duration in 13 months under the ANO system it replaces.

### We did

3.37 We have carefully considered the recency requirements for private ballooning BPL and in summary, we will take the following measures related to experience requirements.

3.38 We will retain the experience element in the recency requirements, though the consultation feedback has prompted us to review this more closely.

3.39 Regarding the number of flights and take-offs/landings, the existing BFCL.160 recency requirements emphasise flight duration over frequency, and does this over a longer period:

- Duration of flying: we understand that achieving 6 hours of flying over 24 months may be difficult for ballooning compared to other aircraft categories, and there may be little gain in pilot experience and knowledge development.
- Minimum number of take-offs and landings: this is broadly similar on average between the ANO and BFCL requirements.
- Reduced validity period: a 24-month period to conduct this flying which could result in an unbalanced distribution of flying across multiple seasons; whereas the community is already familiar with the 13-month validity period.

3.40 We will amend BFCL.160 experience element to replace the existing 6 hours and 10 take-offs and landings in 24 months in favour of 5 flights, each of a minimum 5 minutes’ duration, in the preceding 13 months.

## Phase 2 Balloon consultation outcome – CAA Decision no.9:

**We will mirror where possible the experience element of the former ANO PPL(BA) requirement, which is 5 flights of minimum 5 minutes' duration in the preceding 13 months.**

3.41 We will deliver this by recommending to DfT to amend BFCL.160(a)(1)(i) from the current 6 hours and 10 take-offs and landings in 24 months to 5 flights of minimum 5 minutes' duration in 13 months.

### Refresher training

#### We asked

3.42 We also consulted on applying refresher training to the PPL(BA) revalidation requirements in non-Part 21 balloons. This is especially relevant now that we are also maintaining indefinitely existing licences for private operations in Group A Part-21 balloons.

3.43 We asked specifically 'What are your views towards us making mandatory the requirement for PPL(BA)-holders to undertake refresher training?'

#### You said

3.44 Most respondents were against making mandatory refresher training for PPL(BA) holders:

Option	Total	Percent
Agree with this approach	25	19.5%
Against: PPL(BA) holders should not require refresher training	80	62.5%
Against: all licences should convert to BPL by the deadline	13	10.2%
Undecided	5	3.9%
No view/don't know	0	0%
Not answered	5	3.9%

3.45 While a few respondents favoured keeping the refresher training, most respondent comments argued that this should be deleted altogether from the regulations, and it should not be applied to PPL(BA) holders, arguing that:

- ANO system requiring no refresher training worked sufficiently and there was no safety justification for introducing this; and
- The practical logistics of setting up training flights makes refresher training unworkable and onerous compared to other aircraft categories.

3.46 We also received several comments that the renewal requirements under BFCL.160(c) impose a mandatory proficiency check with a Flight Examiner in Balloons for pilots who do not fully comply with the recency requirements, and no allowance is made for pilots who have partially complied.

### **We did**

3.47 As stated in the consultation paper, we believe that periodic refresher training with an instructor is inherently beneficial for flight safety, as well as being reasonable and informative. There are also unprecedented future changes under way in aviation regulation particularly airspace use, combined with the fact that more is now understood about skill fade and the embedding of poor habits over time.

3.48 We have been told that refresher training is difficult for balloon operations compared to other aircraft categories. In response, we think these are already addressed by allowing such training to take place every 48 months (as opposed to every 24 months as with other aircraft categories), combined with the absence of any minimum training flight duration. Given the inherent safety and learning benefit of such refresher training, we think these relaxed requirements are more than reasonable for balloons.

### **Phase 2 Balloon consultation outcome – CAA Decision no.10:**

**The requirement in BFCL.160(a)(1)(ii) for a refresher training flight with an FI(B) every 48 months will remain.**

3.49 This will apply to PPL(BA) holders flying Part-21 or non-Part-21 balloons. We see no reason why there should be different private ballooning recency requirements depending on the legal basis of the licence issue.

3.50 PPL(BA) holders will also need to comply with the refresher training requirements, albeit we will recommend to DfT to introduce a transitional arrangement so that PPL(BA) holders will have until September 2029 to comply with refresher training requirements in BFCL.160(a)(1)(ii).

### **Phase 2 Balloon consultation outcome – CAA Decision no.11:**

**All PPL(BA) holders will have to comply with the revised recency requirements in BFCL.160 (except refresher training) with effect from 30 September 2025. The refresher training requirement must be complied with by 30 September 2029.**

3.51 To implement this, we will recommend to DfT to amend ANO article 154 to require PPL(BA) holders to comply with the recency requirements in BFCL.160, with a transitional provision to 30 September 2029 to comply with the refresher training requirement.

## Recency requirements for additional classes of balloons

### We asked

- 3.52 Currently, if a pilot is qualified to fly more than one class of balloon, before exercising privileges in those additional classes, Part-BFCL requires the completion of at least three hours of flight time on each additional balloon class within the previous 24 months.
- 3.53 We consulted on adjusting the requirement in BFCL.160(b) to be three hours of flight time, or three flights in the additional class. This would provide routes to maintain recency appropriate for disparate classes, where flights may be of short duration (hot-air airship) or long duration (gas balloon).

### You said

- 3.54 There was strong support to this suggestion in the consultation: 75% of all 128 respondents supported with only 13% against.

Option	Total	Percent
Yes	96	75.00%
No	17	13.28%
Undecided	8	6.25%
No view/don't know	3	2.34%
Not Answered	4	3.12%

### We did

- 3.55 We will proceed with this proposal as consulted.

#### **Phase 2 Balloon consultation outcome – CAA Decision no.12:**

**BPL pilots who have privileges in additional classes of balloons will have to complete at least three flights or three hours of flight time, as PIC or flying dual or solo under the supervision of an FI(B), on each additional balloon class within the previous 24 months prior to the flight in those additional classes.**

- 3.56 We will do this by amending BFCL.160(b) accordingly.



## Chapter 4

# Commercial balloon licensing

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4.1 The consultation described reforms we have suggested on the requirements for commercial ballooning operations, particularly around Commercial Passenger Ballooning (CPB). The specific topics consulted were as follows:

- Splitting the existing commercial rating
- Mandatory training for all commercial rating holders
- Increasing requirements to gain CPB privileges
- Increasing requirements to maintain CPB privileges

4.2 Most of the commercial operations proposals returned majority support from the respondents.

## Splitting the existing commercial rating

### We asked

4.3 We posed in the consultation the idea of splitting the existing commercial rating in Part-BFCL Subpart-ADD into two separate ratings: a **commercial non-passenger operation rating** and a **commercial passenger operation rating**.

4.4 After describing the working group arguments and counter-arguments of this approach, we posed the following question: The CPL(B) as a licence will cease to exist on full transition to Part-BFCL and commercial activities will be covered by a rating on the BPL. As regards the future of the Commercial Rating that could be added to the BPL, which is your preferred option?’

4.5 In terms of response options, in addition to the choices of ‘familiar with issues but undecided’ and ‘no view/don’t know’, we posed the following:

- A single Commercial Rating in Part-BFCL as is currently in place. All commercial operations can be undertaken with that one rating and there remain appropriate requirements for CPB privileges within the rating.
- Two separate commercial ratings as follows: (i) Commercial Passenger Ballooning (CPB) rating; the holders of which would be able to conduct CPB and any other commercial operations; and (ii) Commercial non-passenger operation rating; the holders of which would be able to conduct commercial operations except those involving CPB.

### You said

4.6 There was a majority support for introducing a separate commercial passenger rating. Overall, among the 128 respondents:

Option	Total	Percent
Option 1: a single Commercial Rating in Part-BFCL as is currently in place	43	33.6%
Option 2: two separate commercial ratings as follows: (i) Commercial Passenger Ballooning (CPB) rating [...]; and (ii) Commercial non-passenger operation rating...	58	45.3%
Familiar with the issues but am undecided	5	3.9%
No view/don't know	12	9.4%
Not answered	10	7.8%

- 4.7 Among 50 respondents who said they held a commercial rating, 31 supported Option 2 of two separate ratings and 17 supported Option 1 of the existing one combined rating. However, of the 39 instructors or examiners responding, 15 supported option 2, compared to 18 supporting option 1 of the existing approach.
- 4.8 Comments were largely supportive of the idea, with several comments underscoring the differing nature of risks and activities, and others argued that this is a viable alternative given the demise of the CPL(B). However, others argued that introducing a new rating constitutes unnecessary gold plating, while others pointed out the considerable regulatory and administrative costs and associated confusion of having two ratings, especially when there will have to be a ‘deeming valid’ provision over the first few years for existing rating holders.

**We did**

- 4.9 We think the arguments are strong enough, combined with the sufficient respondent support to introduce this separate commercial passenger operations rating as consulted.
- 4.10 Although pursuing such an approach may be challenging in terms of the drafting complexity and administration, the longer-term benefits are more desirable than those offered by the status quo, the result will be two ratings with requirements that are clear and consistent with the risks and characteristics of the respective activities.

**Phase 2 Balloon consultation outcome – CAA Decision no.14:**

**The current commercial rating will be split into two, a commercial non-passenger operation rating and a commercial passenger operation rating for any type of commercial balloon operations, including CPB.**

- 4.11 We will deliver this by recommending to DfT to amend BFCL.215 by changing its title to ‘Commercial non-passenger operations rating’ and moving all requirements for holders engaged in CPB operations to a new point BFCL.220 entitled ‘Commercial

passenger operations rating’. Consequential amendments will also be necessary for other points in the regulation.

4.12 We will issue the new ratings with effect from the date the amendments come into force. To ease transition, we envisage existing commercial rating holders who meet the requirements of the new Commercial passenger rating to be deemed valid with respect to this new rating until their next administrative touchpoint (eg change of address).

## Mandatory training for all commercial rating holders

### We asked

4.13 Pilots currently wishing to attain a commercial operation rating (whether with commercial passenger privileges or otherwise) are required under BFCL.215(b)(4) to pass a skill test with a flight examiner for balloons to demonstrate the competence required for commercial operations.

4.14 The concerns are that there is no formal training for the issue of a rating prior to the skill test, with too much emphasis placed on the operator to conduct training on specific aspects of commercial flying, for both passenger and non-passenger. This arrangement may be appropriate for larger operators, but less so for smaller or single-pilot operators.

4.15 The consultation proposed to address this issue. The suggested training course would comprise a ground school course of two modules:

- A core element that all candidates seeking any commercial rating would take, covering all commercial non-passenger activities but also an introduction to commercial passenger operations; and
- A second element would be a commercial passenger-specific module for candidates seeking the commercial passenger rating.

4.16 We asked in the consultation: ‘Do you agree with our proposal to introduce mandatory commercial operations ground school training covering elements of both CPB and non-passenger commercial ballooning, ahead of the skill test?’

### You said

4.17 There was strong support among respondents for introducing such a training course, particularly among those who had a view. Overall of the 128 respondents:

Option	Total	Percent
Yes	86	67.2%
No	20	15.6%
Undecided	7	5.5%

No view/don't know	8	6.3%
Not answered	7	5.5%

4.18 Filtered by respondent type: 27 of the 39 instructors/examiners supported this, as did 39 of the 51 commercial pilots, and 41 of the 67 private balloon pilots.

### We did

4.19 We will introduce this training course in line with the requirements set out in the consultation. This will be added to both the commercial non-passenger rating and the commercial passenger rating.

### Phase 2 Balloon consultation outcome – CAA Decision no.15:

**We will introduce a new training requirement for both commercial operation ratings – a course at an ATO or DTO, to include at least two flights with a FI(B) who holds the appropriate instructor privileges, and appropriate ground training course.**

4.20 To deliver this, we will recommend that DfT amend the regulations accordingly to reflect that this course would be tailored based on the nature of the rating sought:

- For the commercial non-passenger rating at BFCL.215, the course would comprise an overview of commercial non-passenger operations but include a short learning objective introducing passenger operations. Therefore we will recommend that paragraph BFCL.215(b) include a new sub-paragraph (4) that reads: '(4) have completed a commercial operation rating training course at an ATO or DTO, which shall include at least two flights with a FI(B) who holds either a commercial non-passenger operation rating or a commercial passenger operation rating, and a ground training course.'
- For the commercial passenger operation rating at BFCL.220, the course would constitute more commercial passenger-centric content, and the flights should be supervised by an instructor who holds the appropriate commercial passenger privileges. We will recommend that the new BFCL.220(b) include a sub-paragraph (4) which reads: '(4) have completed a commercial passenger operation rating training course at an ATO or DTO, which shall include at least two flights with a FI(B) who holds a commercial passenger operation rating, and a ground course which shall include at least the content of the training course referred to in BFCL.220(e)(4).'

4.21 We appreciate the comments received about pilots who will have converted to the BPL with commercial rating from the CPL(B). We propose to also add a new paragraph alleviating holders who have converted their licence from a CPL(B) of having to comply with these new requirements. This would have the effect of only making these requirements apply to new commercial passenger operation rating applicants.

## Increasing requirements to gain CPB privileges

### We asked

4.22 We proposed in the consultation introducing two experience elements;

- A minimum 100-hour PIC experience gateway for CPB, consistent with what is already required by most CPB operators; and
- A stepped minimum number of PIC hours of CPB flying experience in the previous hot-air group size before progressing to the next group. This is in addition to the current general experience requirements under BFCL.150(b).

4.23 A pilot intending to undertake CPB operations in hot-air Group B would have to:

- Undertake at least 100 hours of private or non-CPB flying in a Group A balloon;
- Gain their commercial passenger operation rating in Group A;
- Log 10 hours of CPB flying in Group A balloons (in addition to the 100 hours of general Group A flying described in sub-paragraph (a)); and
- They would also have to gain the Group B rating (minimum of two flights with a suitably qualified FI(B)) and pass a commercial passenger operation rating proficiency check in a group B balloon (with a suitably qualified FE(B)).

4.24 For group progression to larger size groups, the same stepped minimum pattern would apply:

- For progressing to Group C, the pilot would have to record at least 200 hours general experience in Groups A and B combined, of which at least 20 hours of CPB flying in Groups A and B (with at least 10 in Group B); and
- For progressing to Group D, record at least 300 hours general experience in Groups A, B and C combined of which at least 30 hours of CPB flying in Groups A, B and C (with at least 10 in Group C). The larger groups are added in the same manner as described for group B in sub-paragraph (d) above.

4.25 We asked in the consultation ‘Do you agree with our proposal to retain the stepped minimum number of hours for each hot-air balloon group size, and introduce an additional minimum number of hours in CPB operations stepped for subsequent groups, as described in Chapter 4?’

### You said

4.26 There was overall strong support for these CPB experience requirements. Of the 128 respondents:

Option	Total	Percent
Yes	67	52.3%

No, leave unchanged	39	30.5%
Undecided	6	5.0%
No view/don't know	9	7.0%
Not answered	7	5.47%

4.27 Supportive comments mainly stressed the importance of improving safety. Some also argued that Part-BFCL should adopt the written technical exams from the CPL, despite the explanation we gave in the consultation. Opponents of these proposals questioned the need for change, arguing that it would impose a barrier for CPB progression.

### We did

4.28 Given the majority support, we will proceed with this proposal as consulted. Guidance Material (GM) could be added for examiners to confirm the minima have been met prior to undertaking a proficiency check.

#### **Phase 2 Balloon consultation outcome – CAA Decision no.16:**

#### **A stepped minimum hours requirement will be introduced for holders of the Commercial Passenger Operation Rating as follows:**

- for commercial passenger ballooning in a hot air balloon group A or gas balloon or mixed balloon or hot air airship: 100 hours as PIC in balloons;
- for commercial passenger ballooning in a hot-air balloon group B: 110 hours as PIC in balloons of which at least 10 hours commercial passenger ballooning flights in hot air balloons in group A;
- for commercial passenger ballooning in a hot-air balloon group C: 200 hours as PIC in balloons of which at least 20 hours commercial passenger ballooning flights in hot air balloons in groups A and B combined, of which at least 10 hours in group B; and
- for commercial passenger ballooning in a hot-air balloon group D: 300 hours as PIC in balloons of which at least 30 hours commercial passenger ballooning flights in hot air balloons in groups A, B and C combined, of which at least 10 hours in group C.

4.29 This 100-hour minimum could be met through the Operations Manual requirements for operators, without including it in BFCL regulation. However, to assure clarity for all operators, we believe this should be included in BFCL.

4.30 A transitional process of about a year would be needed for those who have converted from the CPL(B) to the BPL under the existing requirements. While most will have amassed the required experience, holders who have recently qualified to carry passengers under the ANO system before they converted may not. The

experience should be achieved by actual flying practice, or if not, the higher group will be inactive until the experience required is gained in the lower group or groups.

## Increasing requirements to maintain CPB privileges

4.31 We proposed in the consultation strengthening the current requirements in BFCL.215(d) and as compared to the ANO system.

4.32 The working group, in consultation with their wider communities, expressed concerns that pilots conducting CPB may currently use the training flights with an instructor to bypass examiner scrutiny. This ignores the limitations of an instructor's role which is to provide training, not to conduct assessment. While the option of proficiency checks versus refresher training may be appropriate for private operations, we do not believe it is appropriate for CPB.

4.33 We proposed two measures:

- Mandatory proficiency check every 2 years; and
- Mandatory refresher ground school course every 5 years.

## Mandatory proficiency check every 2 years

### We asked

4.34 The most workable solution to the above would be to remove the optional nature of the 24-month requirement for a proficiency check with an FE(B) to verify competence in CPB operations, thus making this mandatory for all CPB pilots.

4.35 This gives rise to the concern about new CPB pilots who have only just undertaken a skills test. The solution proposed is that new CPB pilots commencing CPB line flying, having passed their commercial rating skill test within the previous 24 months, would have this FE(B) proficiency check within 13 months of that commencement. This would introduce an additional check for those with low CPB experience.

4.36 We posed the question: 'Do you agree with our proposal to remove for CPB pilots the optional nature of a proficiency check with an FE(B) every 2 years (the proficiency check becomes mandatory)?'

### You said

4.37 There was strong support for this approach, with most in favour:

Option	Total	Percent
Yes	90	70.3%
No, leave unchanged	18	14.1%
Undecided	5	3.9%
No view/don't know	8	6.3%

Not answered	7	5.5%
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4.38 Analysing the responses by those who said they held a balloon licence, 41 (79%) of 51 respondents who said they held a commercial licence or rating supported this proposal; as did 31 of the 38 instructors and examiners responding.

4.39 Respondents were given an opportunity to comment on both this and the next proposal regarding mandatory ground refresher training. Nearly all the comments welcomed us removing the optional nature of the check; however, many questioned reducing the frequency of the proficiency check from 13 months as for the CPL(B) to every 2 years.

### We did

4.40 We will proceed with this proposal as consulted.

### Phase 2 Balloon consultation outcome – CAA Decision no.17:

**It will be mandatory for holders of the commercial passenger operation rating to undertake a proficiency check every 2 years. Those who have passed the relevant skills test less than 2 years ago will have to complete a proficiency check within 13 months preceding the planned flight.**

4.41 We will implement this within a new BFCL.220 provision for the commercial passenger operation rating.

4.42 These requirements would ensure that the pilot underwent a check with an examiner rather than an FI(B) to confirm competence to undertake CPB, with the 24-month limit to prevent any skill fade.

### Mandatory refresher ground school course every 5 years

#### We asked

4.43 We also proposed removing the optional nature of the ATO/DTO ground refresher course and making this mandatory for all CPB pilots every five years. This would be similar to the initial training that is proposed for first issue of the commercial rating, only with greater CPB content that might add the following topics:

- Passenger-handling with large numbers;
- Commercial and operator influences on pilot decision-making; and
- Human performance factors with particular emphasis on emotional distractions and fatigue.

4.44 We posed the question: ‘Do you agree with our proposal to introduce a requirement for CPB pilots to undertake ground refresher training every 5 years?’



## You said

4.45 There was overall strong support for this proposal, with 57% in favour. Of the 128 respondents:

Option	Total	Percent
Yes	73	57.0%
No, leave unchanged	29	22.7%
Undecided	9	7.0%
No view/don't know	10	7.8%
Not answered	7	5.5%

4.46 Comments were received on both this point and the mandatory proficiency check described earlier. Many commented that the mandatory ground course would 'enhance safety' or 'remove complacency'. Several caveated their support with ensuring the course is not excessively onerous or unnecessarily long, and the instructors have sufficient CPB experience themselves.

## We did

4.47 We will proceed with this proposal as consulted.

### **Phase 2 Balloon consultation outcome – CAA Decision no.18:**

**It will be mandatory for holders of the commercial passenger operation rating to undertake a ground refresher training course at an ATO or DTO every 5 years, consisting of six hours theoretical knowledge instruction.**

4.48 We will implement this within a new BFCL.220 provision for the commercial passenger operation rating. We will work with the community to develop the relevant syllabus, based on the existing CPB refresher training provided under AMC1 BFCL.215(d)(2)(ii)(a) but tailored, and ensure that it is given by instructors with CPB experience.

4.49 As this will be a new requirement, we propose a transitional provision of five years after the SI amendment is enacted, to allow time for existing and converted holders to comply.

## Chapter 5

# Instructor and examiner requirements

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5.1 The working group discussed and recommended proposals for changes relating to the instructor and examiner requirements across the following topics:

- Instructor training requirements for instructing pilots seeking the commercial operation rating;
- Proposal for 'Assistant Instructors' for instructing student pilots seeking the Balloon Pilot Licence;
- Instructor requirements for the extension of privileges to additional classes of balloons;
- Examiner requirements for examining pilots seeking/maintaining the commercial operation rating (including CPB privileges);
- Examiner requirements for the extension of privileges to additional classes of balloons; and
- Senior examiner requirements.

## Commercial operation instructor training

5.2 There were proposals about the minimum standards for instructors of commercial ratings, particularly those exercising privileges for CPB operations. We looked at:

- Commercial instructor training course; and
- CPB instructor experience gateway.

## Commercial Instructor training course

### We asked

5.3 We proposed introducing a requirement for commercial operations instructors (both non-passenger and passenger) to undertake the training course along the lines of what is currently required under BFCL.315(a)(3) for night rating or tethered flight rating. It was proposed that there should be content mirroring this specifically for the Commercial Operation rating.

5.4 We asked 'Do you agree with our approach of requiring instructors intending to instruct on commercial ratings to undergo specific training at an ATO/DTO, along the lines of what is already required for tether and night ratings?'

### You said

5.5 There was strong respondent majority support for this proposal, with two-thirds in favour. Of the 128 respondents:

Option	Total	Percent
Yes	84	65.6%
No, leave BFCL unchanged	24	18.8%
Undecided	5	3.9%
No view/don't know	8	6.3%
Not answered	7	5.5%

5.6 Respondents were invited to submit comments to this question, and most were reflective of the poll results. Dissenting comments mainly stated that the ANO instructor requirements are sufficient and should not be increased. Another common theme were concerns about the ATO/DTO system and that such training could easily be provided by FI(B)s.

#### We did

5.7 We will proceed with this proposal as consulted.

#### Phase 2 Balloon consultation outcome – CAA Decision no.19:

**There will be a requirement for instructors exercising privileges for commercial non-passenger or commercial passenger operations to undertake the applicable training course at an ATO or DTO.**

#### CPB instructor experience gateway

##### We asked

5.8 Commercial ballooning experts also argued that instructors training within a CPB environment should have minimum experience both as PIC in CPB line flying and as PIC in the classes and hot-air group sizes which instruction is taking place. It was suggested that a minimum of 50 hours as PIC of CPB flights was proportionate for the extension of privileges to Commercial Operations for FI(B) holders.

5.9 We asked: ‘Do you agree with the view that instructors for the commercial operation rating should have a minimum number of 50 hours of PIC flying in CPB operations?’

##### You said

5.10 The majority supported this proposal, with three-quarters overall in favour. Of the 128 respondents:

Option	Total	Percent
Yes	98	76.6%

No, leave BFCL unchanged	14	10.9%
Undecided	2	1.6%
No view/don't know	7	5.5%
Not answered	7	5.5%

5.11 Although respondents were not invited to submit comments to this specific question, some elected to mention their support for this proposal in the comments to another related question.

### We did

5.12 We will proceed with this proposal as consulted.

### Phase 2 Balloon consultation outcome – CAA Decision no.20:

**FI(B) holders instructing towards the commercial passenger operation rating will require 50 hours PIC on commercial passenger ballooning flights.**

5.13 We will implement this by recommending to DfT to amend BFCL.315 FI(B) certificate – privileges and conditions.

### Instructing with restricted privileges for BPL candidates

#### We asked

5.14 To relax the burden on FI(B)s, whilst still ensuring that BPL candidates receive good quality, standardised dual instruction, we consulted on a proposal in the working group to create a new authorisation provisionally termed the 'Assistant Instructor'.

5.15 The Assistant Instructor was proposed to only be applicable for initial BPL training – holders of the rating would be able to provide some instruction towards the BPL, alongside a minimum number of hours/flights to be conducted by an FI(B).

#### You said

5.16 Most consultation respondents opposed the proposed Assistant Instructor authorisation in the regulations.

#### We did

5.17 As set out in decision number 5, we have reconsidered this proposal in favour of the following approach: PPL(BA) holders converting to the BPL with experience instructing PPL(BA) students in accordance with the former CAP 804 requirements would be issued an FI(B) certificate with restricted privileges for dual flight instruction for the gaining of a BPL only.

5.18 The holder of the restricted FI(B) certificate would then have 9 years to fulfil the requirements for a fully qualified FI(B), including the training course described in BFCL.330(b)(2) and an assessment of competence in accordance with BFCL.345.

- 5.19 We are unable to allow the FI(B) with restricted privileges to continue indefinitely. This is meant as a temporary measure pending future consultation on introducing such a provision on a more permanent basis.
- 5.20 This approach would allow holders of the FI(B) certificate with restricted privileges to decide whether they wish to undergo full FI(B) training and testing to have the restricted privileges removed.
- 5.21 Holders of the FI(B) with restricted privileges would have to comply with BFCL.360 FI(B) certificate – Recency requirements, namely every three years to undertake 6 hours of flight instruction as well as the instructor refresher training.

## Instructors extending privileges to additional balloon classes

### We asked

- 5.22 We proposed that the 15 hours of flight time in an additional class prior to extension of privileges for instructing by an FI(B) in that class, as set out in BFCL.315(a)(2), is not sufficient.
- 5.23 To ensure that an FI(B) has sufficient experience prior to instructing on additional classes, we proposed that the minimum hours required was increased to 30 hours on the additional class and that a minimum number of 15 flights on the additional class is also added.
- 5.24 This adjustment to the current requirement would help to ensure that the FI(B) has experience of the additional class, prior to instructing. While this is important for all additional classes, it is pertinent to gas balloons where it is possible to do 15 (or 30) hours of flight time in one flight, but that would not give the instructor significant experience in various aspects of the aircraft (for example, set up, take-off and landing).
- 5.25 We asked in the consultation: Do you agree with our proposal to adjust the requirements for an instructor wishing to extend their privileges to instruct in additional classes, by changing the minimum requirements to be at least 15 flights and 30 hours of flight time (instead of 15 hours)?

### You said

- 5.26 There was two-thirds support of this proposal. Of the 128 respondents:

Option	Total	Percent
Yes	85	66.4%
No, leave BFCL unchanged	25	19.5%
Undecided	3	2.3%
No view/don't know	8	6.3%

---

Not answered

7

5.5%

5.27 Respondents were invited to submit comments to this specific question, and of the 14 comments received, most seemed to agree with the thinking, with statements around the theme of needing sufficient experience for instruction. A few questioned the need for new regulations in this area beyond what is already required for ANO commercial balloon instructors, even though the consultation is about amending the BFCL requirements.

### We did

5.28 We will proceed with this proposal as consulted.

### **Phase 2 Balloon consultation outcome – CAA Decision no.21:**

**The requirements for an instructor to extend their privileges to instruct in additional classes will increase to 15 flights and 30 hours of flight time (instead of 15 hours).**

5.29 We will deliver this by recommending to DfT to amend BFCL.315 FI(B) certificate – privileges and conditions.

### **Examiner requirements for commercial operations**

5.30 We proposed increasing the minimum prerequisite PIC experience for examiners, overall, as PIC in CPB operations generally, and as PIC in CPB operations in the group size concerned. The view in the working group was that the current requirements in Part-BFCL were well below the ANO requirements and needed adjustment to provide the adequate safety assurance.

5.31 The new proposed requirements for all commercial rating examiners (particularly those examining in the CPB environment) were as follows:

- Minimum 500 hours experience as PIC in balloons (for all examiners);
- Minimum 200 hours experience as PIC of CPB operations (when examining for the commercial operation rating and for CPB proficiency checks); and
- Minimum 100 hours experience as PIC of CPB operations in the group size being examined (when examining for the commercial operation rating and for CPB proficiency checks).

### **Overall experience in balloons**

#### **We asked**

5.32 The first question related to the amount of experience an examiner should possess overall, depending on whether they are exercising privileges in non-passenger operations or CPB operations.

5.33 We asked: 'Do you agree with our proposals to increase the requirements in Part-BFCL for examiners undertaking examining of pilots seeking Commercial Passenger

Ballooning privileges to bring them more into line with the ANO requirements they will replace? Namely: Increase the minimum experience as PIC in balloons from 250 hours to 500 hours (slightly less than the ANO CPL(B) currently requires, to apply to all examiners).'

### You said

5.34 There was strong support for the proposal. Of the 128 respondents:

Option	Total	Percent
Yes	83	64.9%
No, leave BFCL unchanged	13	10.2%
Undecided	13	10.2%
No view/don't know	11	8.6%
Not answered	8	6.3%

### We did

5.35 We will proceed with this proposal as consulted for examiners exercising privileges in CPB and commercial non-passenger operations.

#### **Phase 2 Balloon consultation outcome – CAA Decision no.22:**

**The experience requirement for examiners wishing to exercise privileges in commercial non-passenger or CPB operations will increase from 250 hours to 500 hours overall balloon experience.**

5.36 We will deliver this by recommending to DfT to amend BFCL.415 FE(B) certificate – privileges and conditions.

### **Minimum experience in commercial or CPB operations**

#### **We asked**

5.37 The second question related to the amount of experience an examiner should possess in commercial or CPB operations.

5.38 We asked: ‘Do you agree with our proposals to increase the requirements in Part-BFCL for examiners undertaking examining of pilots seeking Commercial Passenger Ballooning privileges to bring them more into line with the ANO requirements they will replace? Namely: Introduce a minimum 200 hours as PIC on CPB operations, when examining for the commercial operation rating and for commercial passenger ballooning proficiency checks.’

### You said

5.39 There was good support for this proposal. Of the 128 respondents:

Option	Total	Percent
Yes	87	68.0%
No, leave BFCL unchanged	13	10.2%
Undecided	10	7.8%
No view/don't know	11	8.6%
Not answered	7	5.5%

### We did

- 5.40 We will proceed with this proposal as consulted for examiners exercising privileges in CPB operations.
- 5.41 We did note some comments regarding the amount of experience examiners should have when exercising privileges for commercial non-passenger operations – we determined that this should also be raised in line with that previously required for ANO examiners.

### Phase 2 Balloon consultation outcome – CAA Decision no.23:

**The minimum number of hours experience as PIC on commercial non-passenger or CPB operations for examiners exercising privileges in those operations will be:**

- For commercial non-passenger operation privileges – at least 100 hours as PIC of commercial non-passenger ballooning or commercial passenger ballooning operations; and
- For commercial passenger operation privileges – at least 200 hours as PIC of commercial passenger ballooning operations.

- 5.42 We will deliver this by recommending to DfT to amend BFCL.415 FE(B) certificate – privileges and conditions.

### Minimum experience in the group size examined

#### We asked

- 5.43 The third question related to the amount of experience an examiner should possess in commercial or CPB operations in the group size being examined.
- 5.44 We asked: ‘Do you agree with our proposals to increase the requirements in Part-BFCL for examiners undertaking examining of pilots seeking Commercial Passenger Ballooning privileges to bring them more into line with the ANO requirements they will replace? Namely: A minimum of 100 hours experience as PIC of CPB operations in the hot-air balloon group size being examined was proposed, when examining for the commercial operation rating and for commercial passenger ballooning proficiency checks.’



## You said

5.45 There was strong support for this proposal. Of the 128 respondents:

Option	Total	Percent
Yes	80	62.5%
No, leave BFCL unchanged	16	12.5%
Undecided	9	7.0%
No view/don't know	12	9.4%
Not answered	11	8.6%

5.46 We gave respondents the opportunity to provide comments to these three examiner experience requirement questions. Of the 22 comments received, most were in support of the proposals believing they were reasonable and not onerous, with some comments questioning whether the proposals were even sufficient. A few comments argued against any changes to Part-BFCL at all.

## We did

5.47 We will proceed with the proposal as consulted for examiners exercising privileges in CPB operations.

5.48 We also considered the amount of experience examiners should have when exercising privileges for commercial non-passenger operations – we took the view that this should also be raised in line with what was previously required for ANO examiners.

### **Phase 2 Balloon consultation outcome – CAA Decision no.24:**

**The minimum number of hours as PIC of the relevant group size on commercial non-passenger or CPB operations required of examiners wishing to exercise privileges in those operations will be:**

- For commercial non-passenger operation privileges – at least 50 hours as PIC of commercial non-passenger ballooning or commercial passenger ballooning operations in the hot-air group size concerned (or on the group concerned and on larger groups combined); and
- For commercial passenger operation privileges – at least 100 hours as PIC of commercial passenger ballooning operations in the hot-air group size concerned (or on the group concerned and on larger groups combined).

5.49 We will deliver this by recommending to DfT to amend BFCL.415 FE(B) certificate – privileges and conditions.

## Examiners extending privileges to additional balloon classes

### We asked

- 5.50 We posed in the consultation that in line with the changes proposed for Instructors in the previous section, additional measures could be incorporated into the examiner requirements.
- 5.51 We recommended that a requirement of a minimum of 25 flights and 50 hours of flight time on the additional class prior to extension of privileges is added.
- 5.52 We posed the question in the consultation: ‘Do you agree with our proposal to increase the requirements in Part-BFCL for examiners undertaking examining in an additional balloon class by requiring a minimum of 25 flights and 50 hours of flight time as pilot on that additional class?’

### You said

- 5.53 There was strong support in favour of this proposal. Of the 128 respondents:

Option	Total	Percent
Yes	83	64.8%
No, leave BFCL unchanged	15	11.7%
Undecided	10	7.8%
No view/don't know	12	9.4%
Not answered	8	6.3%

- 5.54 Respondents were invited to submit comments, and of the 16 received, the vast majority were along the lines that this proposal is sensible and reasonable. Some believed this experience could be attained in 1-2 years of CPB operations and therefore is not onerous. A few respondents argued against any increase in requirements to Part-BFCL.

### We did

- 5.55 We will proceed with this proposal as consulted.

#### **Phase 2 Balloon consultation outcome – CAA Decision no.25:**

**To exercise examiner privileges in an additional balloon class, the licence holder will need to have 25 flights and 50 hours experience as pilot in that class.**

- 5.56 We will deliver this by recommending to DfT to amend BFCL.415 FE(B) certificate – privileges and conditions.

## Senior examiner requirements

5.57 The assessment of competence for examiners is undertaken by Senior Examiners for Balloons (SE(B)), an authorisation issued by the CAA on our decision. This is provided in BFCL.445 and validity, revalidation and renewal requirements in BFCL.460.

5.58 AMC sets out an assessment of competence syllabus including briefing, conduct of skill test, and/or proficiency check required to record and issue the appropriate certificate. We explored two areas related to SE(B)s:

- Clarifying the role and privileges of the SE(B), removing any uncertainty in the regulations; and
- The minimum experience that should be required of an SE(B).

## SE(B) role and privileges

### We asked

5.59 We proposed that the senior examiner role should be used for both initial issue and revalidation/renewal of examiner certificates.

5.60 We posed the following question in the consultation: Do you agree with our approach to reword the regulations on the assessment of competence for examiners so that: Senior Examiners, in addition to our inspectors, are the only individuals who conduct FE(B) assessments of competence, both for initial issue and revalidation/renewal of examiner certificates?

### You said

5.61 There was a majority support in favour of this proposal. Of the 128 respondents:

Option	Total	Percent
Yes	63	49.2%
No, leave BFCL unchanged	33	25.8%
Undecided	15	11.7%
No view/don't know	9	7.0%
Not answered	8	6.3%

### We did

5.62 We will proceed with this proposal as consulted.

### **Phase 2 Balloon consultation outcome – CAA Decision no.26:**

**It will be made clearer that Senior Examiners and CAA inspectors are the only individuals who conduct FE(B) assessments of competence, both for initial issue and revalidation/renewal of examiner certificates.**

5.63 We will deliver this by recommending to DfT to amend BFCL.460 FE(B) certificate – validity, revalidation and renewal, and introduce a new point at BFCL.470 SE(B) certificate stating that ‘the CAA shall appoint where required Senior Examiners that are specifically authorised for assessments of competence of FE(B)s and oversee their validity, revalidation and renewal.’

## SE(B) experience

### We asked

5.64 We proposed that senior examiners should have 1,000 hours of PIC flight time, of which for examiners seeking privileges to examine CPB candidates, at least 500 hours PIC must be on CPB operations.

5.65 In the consultation we posed the question: Do you agree with our approach to reword the regulations on the assessment of competence for examiners so that: In addition to specific authorisation by us, Senior Examiners must have a minimum experience requirement of 1,000 hours of PIC flight time, of which [for senior examiners seeking privileges to examine commercial operations candidates] at least 500 hours PIC flight time in CPB operations?

### You said

5.66 There was a majority support in favour of this proposal. Of the 128 respondents:

Option	Total	Percent
Yes	61	47.7%
No, leave BFCL unchanged	36	28.1%
Undecided	12	9.4%
No view/don't know	10	7.8%
Not answered	9	7.0%

5.67 Respondents were invited to submit comments and of the 21 comments submitted, while many supported the levels of experience proposed, many also questioned this.

### We did

5.68 We will proceed with developing the guidance material as consulted. The fact that it will be GM as opposed to regulation also gives us the opportunity to discuss further with the community and undertake further public consultation on the most appropriate amount of experience that should be necessary.

## Phase 2 Balloon consultation outcome – CAA Decision no.27:

**We will undertake further consultation with the community to develop the Guidance Material that clarifies the minimum experience for SE(B)s.**

## Chapter 6

## Theoretical knowledge changes

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- 6.1 We considered changes to the theoretical knowledge (TK) exam organisation and procedures, with a view to better integration with flight training and to make the exams less of a disincentive to completing the course.
- 6.2 Currently BFCL.215 lists 9 examination subjects for the BPL, including 5 'common subjects' such as Air Law and Navigation, and four 'aircraft category subjects' such as Principles of Flight and Operational Procedures. The AMC covers details about the learning objectives covered in each subject.
- 6.3 We consulted on the following issues:
- The number of exams;
  - Recommendation by Head of Training; and
  - Exam pass validity periods.

### Number of exams

#### We asked

- 6.4 We considered reducing the number of examinations within the existing system by combining some subjects, for example combining Air Law and Communications. There are some subjects though that if brought together, could result in a much larger potential scope for the candidate.

#### You said

- 6.5 Most respondents were in favour of combining some exams:

Option	Total	Percent
Yes	94	73.44%
No – leave it unchanged	26	20.31%
Undecided	4	3.12%
No view/don't know	0	0.00%
Not Answered	4	3.12%

## We did

6.6 BFCL.135 is drafted in such a way as to allow us to set out in AMC the way these subjects are covered in examination papers, including the number of papers, the number of questions per paper and their duration. We will be exploring this in more detail when we develop AMC later in 2024.

## Recommendation from Head of training

6.7 We proposed removing the requirement in BFCL.135(b)(2) for the Head of Training to recommend the candidate for examinations towards the BPL. We believe we can remove this requirement, because a training organisation will only book an examination for a candidate on the system when they are ready.

## You said

6.8 Most respondents were in favour of this proposal:

Option	Total	Percent
Yes	100	78.12%
No – leave it unchanged	16	12.50%
Undecided	4	3.12%
No view/don't know	3	2.34%
Not Answered	5	3.91%

## We did

6.9 We will look to remove this requirement.

## Exam validity periods

### We asked

6.10 We proposed extending certain validity periods in BFCL.135. We had to balance this with concerns about skill and knowledge fade, for example if we were to remove the validity periods completely.

6.11 We also considered changing the 18-month period in BFCL.135(c)(2) which all examinations must be passed within 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 one(s) that have fallen outside of the 18-month period.

6.12 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.

- 6.13 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.
- 6.14 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.
- 6.15 We looked to explore alternative options to requiring all the examinations to be retaken and requested respondents’ suggestions.
- 6.16 Finally, we considered amending the validity period of the examinations in BFCL.135(d) to change the 24-month period that the theoretical knowledge examinations remain valid for, following their successful completion, to 36 months.

**You said**

**6.17 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 to a rolling validity period?**

<b>Option</b>	<b>Total</b>	<b>Percent</b>
Yes	102	79.69%
No – leave it unchanged	13	10.16%
Undecided	6	4.69%
No view/don’t know	3	2.34%
Not Answered	4	3.12%

**6.18 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?**

<b>Option</b>	<b>Total</b>	<b>Percent</b>
Yes	78	60.94%
No	12	9.38%
Undecided	8	6.25%
No view/don’t know	25	19.53%
Not Answered	5	3.91%

6.19 **Do you have any ideas how we could replace the requirement to retake all the examinations, where a candidate has failed to pass an examination within four attempts?**

6.20 This was an open question. Most responses suggested that the focus should be on further training on the relevant subject, and that the requirement to retake the entire suite of exams was unnecessary.

6.21 **Do you agree with amending the validity period of the theoretical knowledge examinations (the period of time that the theoretical knowledge examinations remain valid for licence issue, following their successful completion) from 24 months to 36 months?**

Option	Total	Percent
Yes	101	78.91%
No – leave BFCL unchanged	16	12.50%
Undecided	2	1.56%
No view/don't know	3	2.34%
Not Answered	6	4.69%

### We did

6.22 With strong support received for all three proposals, we will look to proceed with the implementation of these new requirements.

6.23 Regarding the requirement to retake all examinations after failing an exam within four attempts, we will investigate this further and develop proposals for any changes.

6.24 Note that changes relating to theoretical knowledge requirements will not be progressed until 2025, with possible legislation in 2026.



## Chapter 7

## Next steps

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- 7.1 The Department for Transport will review our OID and put forward legislation as appropriate for enactment, currently planned for the spring of 2025.
- 7.2 There will be a further consultation later in the year on associated Acceptable Means of Compliance (AMC), Guidance Material (GM) and other supporting CAA publications relevant to rule changes.
- 7.3 There will also be a process to ensure that our systems, internal instructions documents and staff are ready for the implementation of these changes.

## APPENDIX A

# Abbreviations

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AMC	Acceptable Means of Compliance
ANO	Air Navigation Order 2016
ATO	Approved Training Organisation
BBAC	British Balloon & Airship Club
BPL	Balloon Pilot Licence
BFCL	Balloon Flight Crew Licensing
CPB	Commercial Passenger Ballooning
CPL(B)	Commercial Pilot Licence (Balloons)
DBO	Declared Balloon Operator
DTO	Declared Training Organisation
EASA	European Aviation Safety Agency
FE(B)	Flight Examiner for Balloons
FI(B)	Flight Instructor for Balloons
FOSIA	Fatal or Serious Injury Accident
GA	General Aviation
GM	Guidance Material
Part-BFCL	Annex III (Requirements for Balloon Flight Crew Licencing) of UK Regulation (EU) 2018/395 for the operation and flight crew licensing of balloons
PIC	Pilot-in-command
PPL(BA)	Private Pilot Licence (Balloons and Airships)
SE(B)	Senior Examiner for Balloons
TK	Theoretical Knowledge
TRE	Type Rating Examiner