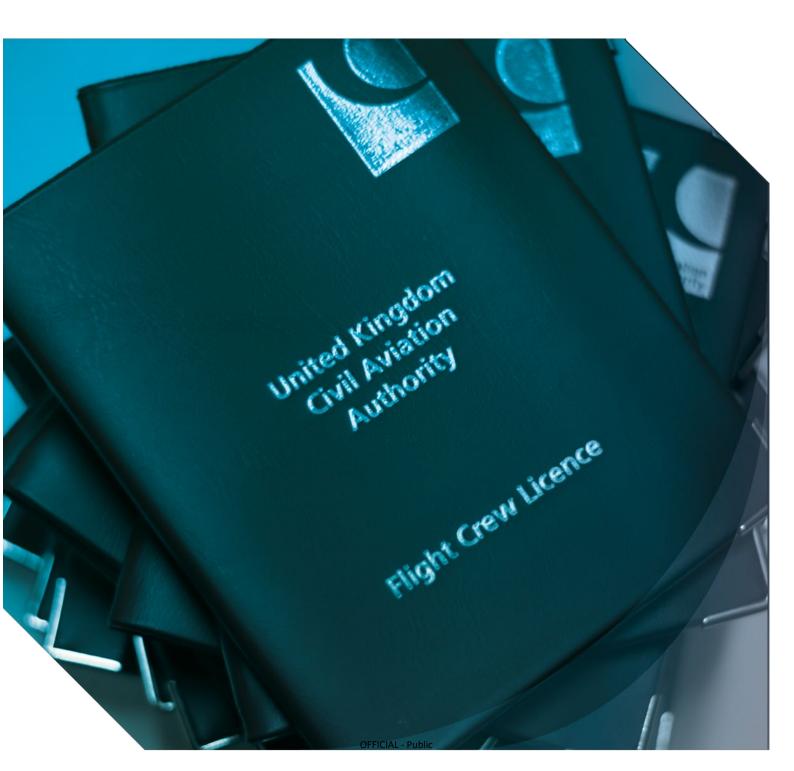


# General Aviation Pilot Medical Declaration Project: Consultation Response Document

CAP 3059



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# Executive Summary

This paper sets out the findings from the consultation on the second phase of the Pilot Medical Declaration (PMD) project and sets out key decisions to proceed with in the final implementation phase of the project.

The consultation ran between 9 November 2023 and 4 January 2024 and elicited 988 unique formal responses.

#### **Overall direction:**

- 38% of respondents agreed/strongly agreed to removing the 5700kg category with a further 46% neither agreeing/disagreeing with this proposal. Only 16% disagreed with this option.
- 64% of respondents disagreed/strongly disagreed with the requirement to confirm holding a UK driving licence or submit a GP declaration if not holding a driving licence.
  29% of respondents did agree/strongly agree with this approach.
- There were mixed views on the two proposals for renewal frequency dependant on age. The results are discussed in further detail in the 'we asked, you said, we did section'.
- Most respondents agreed to the approach of improving the printable version of the PMD.
- 85% of respondents agreed to allowing SPL and BPL students to be able to utilise the PMD for all supervised solo flights and also for licence issue.
- 59% of respondents agreed to remove the mental health aspect of the 'at or less than 2000kg' category.
- 83% of respondents agreed that instructors and examiners for microlights, gyroplanes and balloons should be able to continue to be able to utilise the PMD.
- 85% of respondents agreed/strongly agreed that cost sharing flights should continue to be undertaken utilising the PMD.
- Finally, 85% of respondents agreed that the current restriction of 3 passengers should remain.

#### **Next steps**

- We will begin work on drafting the proposed amendments to the ANO, Part-BFCL and Part-SFCL.
- We will also work on improving the application form, the printable version of the PMD, guidance material on our website and also audio/visual guidance material.

Chapter 1

# Purpose and background

## **Purpose of this document**

- 1.1 We published the second PMD consultation, <u>CAP2604</u>, from 9 November 2023 to 4 January 2024 to publicly consult on the second phase of the Pilot Medical Declaration project.
- 1.2 We received a total of 988 responses to this consultation. Most respondents answered the survey questions and a large number left detailed comments. The consultation questions were worded in such a way to form a survey that could be quantitatively analysed. Most of the questions also gave respondents the opportunity to also leave detailed written comments.
- 1.3 The results of this consultation set out the direction for the final phase of this project and the changes that will be implemented. At several points in this Consultation Response Document (CRD), we set out specific decisions arising from the consultation regarding proceeding with the final phase of this project.

# Background

- 1.4 CAP1284 (Public consultation: UK Private Pilot Licence and National Private Pilot Licence Medical Requirements) was released in June 2015 and resulted in 1,823 responses; one of the largest responses to a consultation we have ever seen.
- 1.5 The response document published to this was CAP1397 (Comment Response Document: UK Private Pilot Licence and National Private Pilot Licence medical requirements) which goes into some detail on the areas the CAA wanted to take forward and implement. This document was published in May 2016.
- 1.6 Pilot Medical Declarations (PMD) were launched in August 2016. Subsequent to the launch, following further community feedback, a number of modifications were made to the PMD system and guidance. This included the alternative criteria for a less than 2000kg category. To date we have had over 14,000 PMD's submitted.
- 1.7 Following a post implementation review of the PMD process in October 2020, by our internal audit team, there were 3 options proposed based on what they found.
  - Option 1: Make no material changes to the PMD process.
  - Option 2: Strengthen the PMD process by means of amendment.
  - Option 3: Remove the PMD scheme.
- 1.8 Based on the findings of the audit and the highlighted risks, we did not feel option1 was the best course of action. A project was launched to review the whole PMD

process and the basic data we hold for PMD holders. From the initial findings which are highlighted in 1.10 and 1.11 below, we felt that option 3 was also not the best course of action based on the finding that the vast majority of PMD holders are declaring correctly. We therefore believed that option 2 would be the best direction to go in.

- 1.9 In November 2020, we also released a consultation on UK General Aviation (GA) opportunities for change now that the UK has left EASA (CAP 1985) followed by the UK General Aviation opportunities after leaving EASA Comment Response Document (CAP 2146) in April 2021. This resulted in 46 initiatives that we wanted to take forward. One of those being a review of the PMD process in order to enhance the end user experience and identify opportunities in the context of the simplification and rationalisation of GA flight crew licensing.
- 1.10 We reviewed 800 out of 14400 PMD holders. We looked at around 400 pilots who had previously had a medical status of unfit or had a medical referred. We also looked at another sample of 400 pilots who had no previous unfit or referred status (control group). This control group was an equal mix of pilots across all age groups.
- 1.11 We found 4% of the 800 PMD holders that we reviewed should not be selfdeclaring for various reasons. If this percentage is representative across all PMD holders, the number made in error is of concern to the CAA. These errors included disqualifying heart conditions, neurological conditions and drug/alcohol misuse. It is not clear to us whether this is due to unclear guidance material or a misunderstanding on the pilot's part.
- 1.12 As part of the project, based on our findings above, we then wanted to revisit the questions originally asked as part of the consultation prior to the launch of PMD. Pilot Medical Declaration review (CAP 2408) was released on the 24th October 2022 and closed on the 5th December.
- 1.13 We received 1770 responses from individuals and 2 responses from organisations.
- 1.14 57% of respondents were PMD holders. We received a clear indication that the majority of respondents felt that the PMD was contributing to flight safety and was proportionate to the risk involved in recreational flying with 91% agreeing.
- 1.15 We also received additional comments from 917 individuals with proposed changes to the PMD system including but not limited to, introducing spot checks of PMD submissions, introducing more regular declarations, improving the declaration form on the portal and also the guidance on the form and website.
- 1.16 The overwhelming theme, equating to over a third of the individual comments, was regarding the use of a PMD for students to fly solo, in particular student pilots seeking a Sailplane Pilot Licence (SPL).

# Chapter 2 Overall approach

## We asked

- 2.1 We considered removing the 5700kg category and restricting the PMD to 'at or less than 2000kg'.
- 2.2 We also considered introducing a requirement for a pilot to confirm they hold a current and valid UK driving licence. If they were unable to do so, they would be required to obtain a declaration from a GP to confirm that they meet the Group 1 DVLA driving standards.

# You said

2.3 Question: We are considering removing the at or less than 5700kg category and restricting the PMD to at or less than 2000kg aircraft. Do you agree with this approach? (982 respondents expressed a view)

Option	Total	Percent
Strongly agree	87	8.85%
Agree	288	29.30%
Neither agree or disagree	450	45.78%
Disagree	98	9.97%
Strongly disagree	59	6.00%
Not Answered	8	0.81%

- 2.4 Respondents indicated some support to removing the 5700kg and restricting the PMD to 'at or less than 2000kg'.
- 2.5 Over 30% of respondents either agreed or strongly agreed.
- 2.6 15% of respondents disagreed or strongly disagreed with this proposal.
- 2.7 Nearly half of respondents neither agreed nor disagreed.
- 2.8 Question: We would like a pilot to confirm they hold a current and valid UK driving licence when submitting a PMD. If a pilot does not hold a driving licence, then they would be required to submit a declaration from their GP to

# confirm they meet the Group 1 DVLA driving standards (note any costs incurred in this will be borne by the pilot). Do you agree with this change? (979 respondents expressed a view)

Option	Total	Percent
Strongly agree	108	10.99%
Agree	181	18.41%
Neither agree or disagree	57	5.80%
Disagree	141	14.34%
Strongly disagree	492	50.05%
Not Answered	4	0.41%

- 2.9 Over 60% of respondents either disagreed or strongly disagreed.
- 2.10 29% of respondents either agreed or strongly agreed.

#### **Comments left by respondents**

- 2.11 Respondents were also given the chance to leave detailed comments on each of the questions.
- 2.12 A large number of comments left by the "agree/strongly agree" respondents to question 7 confirmed that most aircraft flown by General Aviation pilots for pleasure were at or below 2000kg.
- 2.13 An alternative suggestion received by a number of respondents who disagreed with the proposal, was to remove the 5700kg category but increase the 'at or less than 2000kg' category. Weights suggested ranged from 2500kg to 3000kg.
- 2.14 A large number of the comments left by the "disagree/strongly disagree" respondents to question 8 were around the fact that many student pilots begin flying at a very young age, long before they are able to gain a UK Driving Licence. In particular, gliding students and balloon students, who are able to fly their first supervised solo at 14.
- 2.15 There were also over 150 comments from respondents that felt there would be an unnecessary cost implication for obtaining a GP signature.
- 2.16 A number of respondents also made the following comments:
  - a) No medical is required for the issue of a UK Driving Licence so why require one for the PMD.

- b) A 2023 update DfT travel survey revealed many people under 30 years old do not have driving licences.
- 2.17 A common alternative suggestion, for those younger pilots who do not hold a UK Driving Licence, received by a significant number of respondents, was to allow a declaration that was countersigned by a parent/guardian.

## We did

- 2.18 We interpreted the results of these two questions and have taken into account the individual comments and suggestions.
- 2.19 We need some assurance surrounding the fitness to fly and holding a driving licence demonstrates that an individual has sufficient vision, hearing, cognition, and motor skills that are required to operate a complex machine like an aircraft.
- 2.20 A large proportion of pilots hold a driving licence and for treating physicians, medical conditions that could affect the fitness to drive, are discussed. Without this we have no governance and would be failing to provide safety assurance. The alternative is a return to a formal medical.
- 2.21 We have therefore taken the following decisions:

#### Phase 2 Consultation Outcome – CAA Decision no.1

We will remove the 5700kg category and restrict the PMD to at or less than 2000kg category

#### Phase 2 Consultation Outcome – CAA Decision no.2

We will be introducing a requirement for a pilot to confirm that they hold a UK driving licence. If a pilot does not hold a UK driving licence, they will be required to submit a declaration from a GP to confirm that they meet the DVLA Group 1 driving licence standards

# Chapter 3 Renewal periods

## We asked

- 3.1 We described in this section our intentions to introduce renewal frequencies in line with existing medical certification systems.
- 3.2 The 5-year renewal frequency is broadly accepted for younger, lower risk pilots. As cardiovascular, vision and hearing deteriorate in the over 60's, a more frequent renewal period was deemed appropriate.

# You said

3.3 Question: We propose introducing a 5 yearly PMD renewal, which will include educational material on fitness to fly, up to the age of 60. Do you agree with this change? (976 respondents expressed a view)

Option	Total	Percent
Strongly agree	76	7.73%
Agree	268	27.26%
Neither agree or disagree	130	13.22%
Disagree	289	29.40%
Strongly disagree	213	21.67%
Not Answered	7	0.71%

- 3.4 The community expressed mixed views on introducing a 5-year renewal frequency up to age 60.
- 3.5 35% of respondents either agreed or strongly agreed with this proposal.
- 3.6 51% of respondents either disagreed or strongly disagreed with this proposal.
- 3.7 13% of respondents neither agreed nor disagreed.

3.8 Question: We propose introducing a two-yearly PMD renewal, which will include educational material on fitness to fly, from the age of 60. Do you agree with this change? (978 respondents expressed a view)

Option	Total	Percent
Strongly agree	116	11.80%
Agree	438	44.56%
Neither agree or disagree	127	12.92%
Disagree	169	17.19%
Strongly disagree	128	13.02%
Not Answered	5	0.51%

- 3.9 The introduction of a 2 yearly renewal from the age of 60 was better received with 56% of respondents agreeing or strongly agreeing.
- 3.10 Nearly 13% of respondents neither agreed nor disagreed.
- 3.11 30% of respondents either disagreed or strongly disagreed with this proposal.

#### Specific comments left by respondents

- 3.12 There were several recurring themes emerging from the detailed comments left by respondents:
  - a) There were over 200 individual comments that called for a 5 yearly reminder rather than a renewal of the PMD.
  - b) There were various other suggestions to the age at which renewal frequency should change:
    - No renewals until 45
    - No renewals until 70, in line with DVLA requirements
    - 5 yearly renewals only from 50
    - No renewals until 60

# We did

- 3.13 Whilst we take on board all views expressed and the alternatives suggested, we believe, as per our proposal, a 5 yearly renewal up to the age of 60 is proportionate and aligns with existing medical certification systems.
- 3.14 As cardiovascular, vision and hearing deteriorate in the over 60's, a 2 yearly renewal is proportionate from this age.
- 3.15 We have therefore taken the following decisions:

#### Phase 2 Consultation Outcome – CAA Decision no.3

We will introduce 5 yearly renewals from the date of a pilots first PMD until the age of 60

#### Phase 2 Consultation Outcome – CAA Decision no.4

We will introduce 2 yearly renewals from the date a pilot turns 60

# Chapter 4 Guidance

# We asked

- 4.1 Our proposals in this section ranged from improving the printable version, providing educational material which may include audio-visual material to improve understanding of the criteria for the PMD.
- 4.2 Improved guidance is a key part of the PMD project.
- 4.3 We also proposed a requirement to carry a paper copy of the PMD to act as an aid memoire for expiry dates, exclusion criteria and privileges.

# You said

4.4 Question: Do you agree that we should include educational material as part of the PMD issue and renewal? (979 respondents expressed a view)

Option	Total	Percent
Strongly agree	281	28.59%
Agree	550	55.95%
Neither agree or disagree	109	11.09%
Disagree	22	2.24%
Strongly disagree	17	1.73%
Not Answered	4	0.41%

- 4.5 Nearly 85% of respondents agreed with our proposal to include guidance material as part of the PMD issue and renewal.
- 4.6 Only 4% either disagreed or strongly disagreed with this approach.

4.7 Question: Do you agree with our approach to improve the printable version of a PMD to include the PMD expiry date? (977 respondents expressed a view)

Option	Total	Percent
Strongly agree	369	37.54%
Agree	496	50.46%
Neither agree or disagree	74	7.53%
Disagree	17	1.73%
Strongly disagree	21	2.14%
Not Answered	6	0.61%

- 4.8 88% of respondents also agreed or strongly agreed with our proposal to improve the printable version of the PMD to include the expiry date.
- 4.9 65 individuals expressed a strong view against introducing a requirement to carry a paper copy of the PMD.
- 4.10 300 respondents provided individual comments on the request for suggestions to improve the guidance/printable version of the PMD.
- 4.11 There were a number of common suggestions to this question:
  - Make the printable PMD a similar format to a pilot licence so that it can fold neatly into a licence wallet.
  - Improving the website to ensure clarity of requirements/disqualifying conditions.
  - Including the date of the declaration as well as the expiry date.
  - Allow the PMD to be saved in a PDF format for those with no access to printers.
  - Improve Cellma and the application process as a whole.
  - Email reminders prior to renewal date
  - A space on the printed declaration for the pilot to sign as per the licence.
  - A medical questionnaire that a pilot must complete prior to being able to submit a PMD.

# We did

- 4.12 We intend to proceed with improving the guidance on the website to include clear criteria on what is and isn't acceptable for a PMD, educational material and links to the DVLA website.
- 4.13 We also intend to improve the application form on the portal as well as the printable version of the PMD. This will include the date of declaration, the expiry date, the pilots name and licence number and also a space for a pilot to sign the declaration.
- 4.14 We have therefore taken the following decisions:

#### Phase 2 Consultation Outcome – CAA Decision no.5

Improve the website to include clear criteria for PMD, educational material and links to the DVLA website

#### Phase 2 Consultation Outcome – CAA Decision no.6

Improve the application form on the portal and the printable version of the PMD to include date of declaration, date of expiry, pilots name and licence number and a space for the pilot to sign the declaration

#### Phase 2 Consultation Outcome – CAA Decision no.7

We will not be introducing a requirement to carry a paper copy or PDF version of the PMD

# Chapter 5 Current limitations

# We asked

- 5.1 In this section, we explored the current limitations of the PMD:
  - in an aircraft with a maximum take-off mass of 5,700kg or less;
  - with not more than three passengers on board;
  - by day or when exercising the privileges of a night rating;
  - in visual meteorological conditions or when exercising the privileges of an instrument meteorological conditions rating; and
  - within the United Kingdom unless the holder has the permission of the competent authority for the airspace in which the aircraft is being flown
- 5.2 We felt that the current limitations were still acceptable although, as mentioned earlier in this document, changing the maximum take-off weight to 'at or less than 2000kg' instead of 5700kg.
- 5.3 Proposed improvements included:
  - Allowing Part-FCL holders to exercise IR(R) privileges whilst utilising a PMD if the rating was current and valid.
  - Allowing student Sailplane Pilot Licence (SPL) and Balloon Pilot Licence (BPL) pilots to utilise a PMD for their supervised solo flights and also their licence issue.
  - Removing the limitation for those taking medication for psychiatric illness

# You said

5.4 Question: To what extent do you agree that the current limitations for the at or less than 2000kg are proportionate and should remain unchanged? (976 respondents expressed a view)

Option	Total	Percent
Strongly agree	169	17.19%
Agree	222	22.58%
Neither agree or disagree	180	18.31%
Disagree	104	10.58%
Strongly disagree	301	30.62%
Not Answered	7	0.71%

- 5.5 There was a mixed response to the question around current limitations for the 'at or less than 2000kg' category remaining unchanged.
- 5.6 40% of respondents either agreed or strongly agreed to this proposal.
- 5.7 41% of respondents either disagreed or strongly disagreed to this proposal.
- 5.8 The rest either did not answer or neither agreed nor disagreed with the proposal.
- 5.9 497 respondents provided additional comments to their response. Some common themes arising from these comments include:
  - Increase the weight category.
  - Allow IR holders to utilise PMD after providing evidence of an audiogram.
  - Allow IR(R) holders on a Part-FCL licence to utilise PMD.
  - Remove the limitation for those taking medication for psychiatric illness

5.10 Question: To what extent do you agree that student pilots for SPL and BPL should be able to utilise the PMD for their supervised solo flights and application for SPL and BPL? (977 respondents expressed a view)

Option	Total	Percent
Strongly agree	638	64.90%
Agree	200	20.35%
Neither agree or disagree	109	11.09%
Disagree	17	1.73%
Strongly disagree	13	1.32%
Not Answered	6	0.61%

- 5.11 We received overwhelming support for the proposal to allow SPL and BPL students to utilise a PMD for all supervised solo flights and also licence issue.
- 5.12 85% of respondents either agreed or strongly agreed with this proposal.
- 5.13 Only 3% of respondents disagreed or strongly disagreed to this proposal.
- 5.14 We received 553 additional comments to this proposal. Most reiterated that they agreed with the proposal and felt it was a great improvement.
- 5.15 Several comments also requested that we allow the use of PMD for Part-FCL LAPL and Part-FCL PPL students as well.
- 5.16 Question: To what extent do you agree that the mental health aspect for the at or less than 2000kg category should be removed? (977 respondents expressed a view)

Option	Total	Percent
Strongly agree	217	22.08%
Agree	360	36.62%
Neither agree or disagree	248	25.23%
Disagree	100	10.17%
Strongly disagree	52	5.29%
Not Answered	6	0.61%

- 5.17 We received a strong response in agreement with our proposal to remove the mental health aspect of the at or less than 2000kg category with 59% of respondents either agreeing or strongly agreeing.
- 5.18 Another 25% of respondents neither agreed nor disagreed.
- 5.19 Only 15% of respondents disagreed or strongly disagreed with this proposal.
- 5.20 We received 527 additional comments to this proposal with two of the most common responses being:
  - DVLA mental health requirements are sufficient and the PMD should be aligned with this.
  - This would allow the use of common anti-depressants which is a positive step.
- 5.21 Question: Do you agree that instructors and examiners, who fly Microlights, Gyroplanes and Balloons (not including CPL(G), CPL(B), BPL for Commercial Passenger flights),should be able to continue? (976 respondents expressed a view)

Option	Total	Percent
Strongly agree	369	37.54%
Agree	446	45.37%
Neither agree or disagree	131	13.33%
Disagree	23	2.34%
Strongly disagree	7	0.71%
Not Answered	7	0.71%

- 5.22 We received another strong response in agreement to our proposal to continue to allow instructors and examiners for Microlights, Gyroplanes and Balloons to utilise the PMD (not including CPL(G), CPL(B), BPL for commercial passenger flights)
- 5.23 Nearly 83% of respondents either agreed or strongly agreed with this proposal.
- 5.24 13% neither agreed nor disagreed and only 3% disagreed or strongly disagreed.
- 5.25 We received 425 additional comments to this proposal.
- 5.26 A small number of those comments believed that all instructors should hold a Class 2 medical rather than being allowed to operate on a PMD.

- 5.27 Various other comments suggested that we should also allow instructors for Part-FCL PPL and Part-FCL LAPL to instruct whilst utilising a PMD. This is not currently permitted under Part-MED.
- 5.28 Question: Currently, a pilot undertaking a cost sharing flight with up to 3 passengers can do so whilst having made a PMD. Do you agree that a PMD is sufficient for a pilot undertaking this type of activity? (977 respondents expressed a view)

Option	Total	Percent
Strongly agree	313	31.84%
Agree	525	53.41%
Neither agree or disagree	93	9.46%
Disagree	31	3.15%
Strongly disagree	15	1.53%
Not Answered	6	0.61%

- 5.29 We received strong support for the proposal to continue to allow cost sharing flights whilst utilising a PMD.
- 5.30 85% of respondents either agreed or strongly agreed with this proposal.
- 5.31 9% did not agree nor disagree with this proposal and only 4.5% disagreed or strongly disagreed with this proposal.
- 5.32 We received 456 additional comments to this proposal. A number of those felt that this proposal should have been addressed in the cost sharing consultation rather than this consultation.

5.33 Question: What do you believe the passenger restriction for the PMD should be? (977 respondents expressed a view)

Option	Total	Percent
No passengers	19	1.93%
Up to 3 passengers (As is)	815	82.91%
Up to 3 passengers, with all passengers being informed that the pilot is operating using a PMD and not a medical certificate. Any passengers under the age of 18, parents must be informed and give consent)	136	13.84%
Not Answered	13	1.32%

- 5.34 The final question received strong support to keep the passenger restriction as is (up to 3 passengers) with nearly 83% of respondents selecting this option.
- 5.35 Nearly 14% felt that it should remain at up to 3 passengers, with all passengers being informed that the pilot is using a PMD and not a medical certificate, and with any passengers under the age of 18, parents must be informed and give consent.
- 5.36 Just under 2% of respondents felt that there should be no passengers allowed.

# We did

- 5.37 In light of the amendments that we have suggested throughout this consultation, we were unsurprised with the mixed response to question 14, should current limitations for the 'at or less than 2000kg' category remain unchanged.
- 5.38 We feel that removing the limitation for pilots who are taking medication for a psychiatric illness is a positive step and more aligns the requirements to those of the DVLA Group 1 driving licence.
- 5.39 The strong support received for allowing student SPL and BPL pilots to be able to utilise a PMD for first supervised solos and also licence issue, along with our internal risk assessment (positively supports this change), allows us to implement this change.
- 5.40 There were a number of comments requesting that PMD should also be allowed for Part-FCL LAPL and PPL students. This was consulted on as part of the Licensing and Training Simplification project. The consultation response documents were released on 12<sup>th</sup> September 2024.

- 5.41 We will continue to allow instructors and examiners who fly Microlights, Gyroplanes, Balloons and Sailplanes (not including CPL(G), CPL(B), BPL for Commercial Passenger flights) to instruct whilst utilising a PMD.
- 5.42 We will not be making any changes to the ability to undertake cost sharing flights, with up to 3 passengers, whilst utilising a PMD
- 5.43 In addition, we will not be making any changes to the number of passengers allowed whilst utilising the PMD.
- 5.44 We will allow Part-FCL licence holders who also hold a current and valid IR(R) rating to exercise those privileges whilst utilising a PMD.
- 5.45 We have therefore taken the following decisions:

Phase 2 Consultation Outcome – CAA Decision no.8

We will proceed with the decision to remove the limitation against pilots who are taking medication for a psychiatric illness.

Phase 2 Consultation Outcome – CAA Decision no.9

We will proceed with the decision to allow SPL and BPL students to utilise a PMD for supervised first solos and also for licence issue.

Phase 2 Consultation Outcome – CAA Decision no.10

We will proceed with the decision to allow Part-FCL licence holders who also hold a current and valid IR(R) rating, to exercise those privileges whilst utilising a PMD.

# Chapter 6 Next steps

- 6.1 The PMD project is currently on hold whilst we work to identify an IT system capable of supporting the proposed changes to PMD.
- 6.2 Once a system is identified and developed, the internal working group will begin drafting the proposed amendments to the Air Navigation Order (ANO), Part-SFCL and Part-BFCL. We will provide updates to our Stakeholders in due course.
- 6.3 Whilst we await the legislative changes being implemented, we will work with internal colleagues to improve the website guidance.
- 6.4 We will be introducing internal checks of PMD submissions, once the changes have been implemented. Whilst we will not check every PMD submitted, we will check a percentage of daily submissions. This will be a new task within the Medical department of the Shared Services Centre (SSC). As mentioned in the consultation, this will result in a charge being implemented for the PMD. This will be addressed as part of the annual scheme of charges consultation prior to implementation.
- 6.5 Once all changes have been implemented and the updated PMD system has been rolled out, all PMD holders will have a period of 12 months within which they MUST apply for the new PMD.
- 6.6 After this 12 month period has passed, all PMD's under the previous requirements will no longer be valid.

#### **APPENDIX A**

# Abbreviations

ANO	Air Navigation Order 2016
BFCL	Balloon Flight Crew Licensing
BPL	Balloon Pilot Licence
CAP	Civil Aviation Publication
CPL	Commercial Pilot's Licence can be issued for an Aeroplane (A), Helicopter (H), Balloons (B), Airships (A) or Gyroplane (G)
CRD	Comments Response Document
DfT	Department for Transport
DVLA	Driver and Vehicle Licensing Agency
FCL	Flight Crew Licensing
GA	General Aviation
GP	General Practitioner
IMC Rating	Instrument Meteorological Conditions (IMC) Rating issued in accordance with the ANO 2016, guidance on the rating is in Standards Document 25.
IR(R)	Instrument Rating (Restricted): issued in accordance with the ANO 2016, guidance on the rating is in Standards Document 25.
LAPL	Light Aircraft Pilot Licence can be issued for an Aeroplane (A), Helicopter (H)
MTOM	Maximum Take off Mass
MTOW	Maximum Take off Weight
NPPL	National Private Pilots Licence
Part-FCL	Annex 1 to the Aircrew Regulation
PMD	Pilot Medical Declaration
PPL	Private Pilot Licence: can be issued for an Aeroplane (A), Helicopter (H), Balloons & Airships (BA) or Gyroplane (G)
SFCL	Sailplane Flight Crew Licensing
SPL	Sailplane Pilot Licence
VFR	Visual Flight Rules