

# General Aviation Pilot Licensing Review

## Phase 2: Detailed Proposals

### Balloons

A consultation – Executive Summary

CAP 2974D



Published by the Civil Aviation Authority, 2024

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First published March 2024

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

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# Summary

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1. The CAA is now continuing with the project to simplify General Aviation (GA) flight crew licensing and training, and this paper consults on detailed proposals for balloons. Similar consultations are being undertaken for aeroplanes, sailplanes, and helicopters and gyroplanes. This consultation closes on XX April 2024.
2. This document summarises the contents of CAP2974B Balloon Licensing Phase 2 Consultation, and presents just a high level summary of our key proposals, a note on the background and next steps, and the Questions themselves.
3. Readers wishing to see further detail and explanation of these proposals should refer to the main document. To assist with this, we have grouped the proposals below and the Questions by the chapters where they can be found in that document.

## Background and proposals by chapter

### Chapter 1: Introduction, scope and background

- This consultation reflects work we undertook since May 2023 collaboratively with a working group of GA community balloon experts to develop more the detailed proposals in this paper.
- The aim is threefold: to improve practices and regulatory certainty for pilots, operators and the public; to simplify the licensing structure where possible into a single licence issuing regime; and to take this opportunity to embed into UK Part-BFCL some of the best aspects of the licences issued under the Air Navigation Order 2016 (ANO).
- The scope of this consultation encompasses the requirements to gain and maintain flight crew licences, ratings and certificates involved in the following operations: private ballooning; commercial operations including non-passenger ballooning (previously known as ‘aerial work’) and CPB; and instructors and examiners involved in the above activities.
- Most questions in this consultation provide a list of possible answers, and many (but not all) will also provide space to comment. Regarding the possible answers, the format often used is ‘yes’, ‘no’, ‘undecided’ and ‘no view/don’t know’, with the latter two options distinguished by understanding of the subject matter.

- This project coordinates with our separate work to implement the Balloon Regulation. We strongly advise that PPL(BA) and CPL(B) holders wishing to continue exercising privileges as pilot-in-command of Part-21 balloons to proceed with conversion as soon as possible and well ahead of the September 2025 deadline.
- We will not be ‘deeming’ the PPL(BA) as CPL(B) as equally valid as their Part-BFCL counterparts.

## **Chapter 2: Embedding the reforms**

- We will be using the responses to this consultation to inform our final recommendations to the Department for Transport for amending the Balloon Flight Crew Licensing part of the Balloon Operations and Flight Crew Licensing UK Regulation (EU) 2018/395.
- We would be developing transitional arrangements for a year after enactment before the community are expected to comply with the regulations.

## **Chapter 3: Private ballooning**

- Reducing the minimum number of dual hours with a Balloon Flight Instructor [FI(B)] to gain a Balloon Pilot Licence (BPL), and introducing a lighter-touch authorisation tentatively entitled ‘Assistant Instructor’ who would supervise the remaining dual hours.
- Suggestion to remove the requirement for BPL training to be undertaken by an Approved Training Organisation or Declared Training Organisation.
- Deleting the existing tethering rating and embedding tethering training into the base BPL
- Removing the experience element from the BPL recency requirements, so that holders only require a training flight with an FI(B) every 24 months.
- Making the recency requirements for additional classes of balloons more flexible by allowing 3 flights or 3 hours of flight time, and exploring reducing the frequency from 24 months to 48 months.
- Allowing the PPL(BA) to continue for solely Non-Part-21 ballooning, and ceasing to issue new PPL(BA) licences from September 2025.

## **Chapter 4: Commercial including passenger ballooning**

- Introducing a minimum 100-hour PIC experience gateway for Commercial Passenger Ballooning (CPB). Introducing a stepped minimum number of PIC hours of CPB flying experience in the previous hot-air group size before progressing to the next group, in addition to the current general experience requirements.

- Introducing a mandatory training course by an ATO or DTO to the commercial operation skill test, comprising ground school course and an appropriate number of training flights with an FI(B).
- Making mandatory for CPB pilots the 24-month proficiency check with a Balloon Flight Examiner [FE(B)] to verify competence in CPB operations.
- Making mandatory for CPB pilots a ground refresher course every 5 years.
- Consulting on whether to introduce a separate Commercial Passenger Ballooning rating for holders wishing to conduct all types of commercial operations including CPB to go alongside a Commercial Non-Passenger rating just for ‘aerial work’.

## Chapter 5: Instructors and examiners

- Introducing a light-touch authorisation tentatively titled ‘Assistant Instructor’ for any licence holder wishing to supervise BPL trainees, with a short training course and minimal revalidation/recency requirements.
- Introducing for instructors for the commercial operation rating a requirement to undergo specific training with an ATO or DTO, along the lines of what is already required for tether and night ratings. Imposing a minimum qualifying experience for instructors undertaking CPB instructing of 50 hours of PIC flying in CPB operations.
- Adjusting 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)
- Tightening the requirements for CPB and commercial rating examiners: increasing 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); introduce a minimum 200 hours experience as PIC of CPB operations (when examining for the commercial rating including CPB proficiency checks); and a minimum 100 hours experience as PIC of CPB operations in the hot-air balloon group size being examined (when examining for commercial rating including the CPB proficiency checks).
- Senior Examiners, in addition to an inspector from the CAA, are the only individuals who conduct FE(B) assessments of competence, both for initial issue and revalidation/renewal of examiner certificates; and introducing a requirement to have a minimum experience requirement of 1,000 hours of PIC flight time.

# Introduction, scope and background

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1. The CAA is now continuing with the project to simplify General Aviation (GA) flight crew licensing and training, and this paper consults on detailed proposals for balloons and airships. Similar consultations are being undertaken for aeroplanes, sailplanes, helicopters and gyroplanes.
2. This work follows an earlier consultation, [CAP2335](#), in Autumn 2022. The 1,246 GA community responses<sup>1</sup> showed strong support in several key areas for updating our current legislation with regards to licensing and training.
3. This consultation explores these key areas in more detail, to ensure that we are working towards the goals of the community whilst maintaining legislative compliance within these areas. It reflects work we undertook since May 2023 collaboratively with a working group of GA community balloon experts to develop more detailed proposals.
4. The Balloons working group was tasked to consider a list of topics and make recommendations on the details. The group met seven times between June and November 2023, and were asked to consider a list of topics in work strands where they discussed proposals set out in various member written submissions. Then a series of ‘consolidation papers’ were developed summarising the considered recommendations across each of the work strands, and formed the basis of this consultation.
5. This licensing project has focused on reviewing the requirements for the Balloon Pilot Licence (BPL) as well as ratings and certificates issued under UK Part-BFCL (the Balloon Flight Crew licensing part of the assimilated UK Balloon Operations and Flight Crew Licensing Regulation (EU) No 2018/395<sup>2</sup>), including for private ballooning, commercial including Commercial Passenger Ballooning (CPB), and the associated instructors and examiners to exercise privileges across those first two groups. The aim is threefold:
  - a) to improve practices and regulatory certainty for pilots, operators and the public;

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

<sup>2</sup> Hereafter in this consultation, that regulation will be referred to as ‘the Balloon Regulation’. All UK regulations can be found on the CAA website: <https://www.caa.co.uk/uk-regulations/>

- b) to simplify the licensing structure where possible into a single licence issuing regime; and
- c) to take this opportunity to embed into UK Part-BFCL some of the best aspects of the licences issued under the Air Navigation Order 2016 (ANO).

## Scope and responding to this consultation

6. The scope of this consultation encompasses the requirements to gain and maintain flight crew licences, ratings and certificates involved in the following operations:
  - a) private ballooning;
  - b) commercial operations including non-passenger ballooning (previously known as 'aerial work') and CPB; and
  - c) instructors and examiners involved in the above activities.
7. This consultation closes on **22<sup>nd</sup> May 2024**. Please use the on-line response tool provided here: <https://consultations.caa.co.uk>
8. Most questions in this consultation provide a list of possible answers, and many (but not all) will also provide space to comment. Regarding the possible answers, the format often used is 'yes', 'no', 'undecided' and 'no view/don't know'.
9. In relation to the latter two options, the 'undecided' option is for respondents who are familiar with the subject matter presented but have not firmly settled in support or otherwise. Meanwhile the 'no view/don't know' option is for respondents who are unfamiliar with the subject or have no view on the issue.

## Background

### Balloon Regulation implementation

10. This project coordinates with our separate work to implement the Balloon Regulation, the licensing part of which was enacted into UK law in March 2020 before the UK departed from the European Union, and before this licensing project began.
11. It is important to emphasise that effective on the revised deadline of September 2025, only licences issued under Part-BFCL, namely the BPL with appropriate ratings and certificates where applicable, will be valid to exercise privileges as pilot-in-command of Part-21 balloons.
12. Licences issued under the ANO, namely the Private Pilot Licence (Balloons & Airships) [PPL(BA)] and the Commercial Pilot Licence (Balloons) [CPL(B)] will no longer be valid on Part-21 balloons, and holders of these licences wishing to continue to exercise privileges in Part-21 balloons must convert their licences to their equivalent in Part-BFCL by that deadline. We have set out our approach in

Chapter 3, Section F regarding PPL(BA) holders wishing to only exercise privileges in Non-Part-21 balloons.

13. Please note that we are not consulting on whether to continue implementing the Balloon Regulation or to repeal any part of it. Instead this project has focused on amending the content within Part-BFCL to better reflect the needs of UK ballooning.
14. A licence conversion process has been under way since the Regulation was enacted in 2020. By September 2025, ANO licence holders will have had 5 years since enactment of Part-BFCL into UK law to operate Part-21 balloons with their licences. We strongly advise that PPL(BA) and CPL(B) holders wishing to continue exercising privileges as described above proceed with conversion as soon as possible and well ahead of the September 2025 deadline.
15. This 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 in 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.

#### **'Deeming valid'**

16. A few members of the working group did request that we explore recommending to the Department for Transport to create a provision in the Balloon Regulation that would 'deem valid' ANO licences as their equivalent licences/ratings in Part-BFCL to exercise privileges as pilot-in-command of Part-21 balloons.
17. We have explored this matter carefully and concluded that we will not take this forward:
  - a) 'deeming valid' these licences would require us to maintain and significantly amend the ANO licensing regime to align with Part-BFCL. This approach, or any other mechanism to achieve the same outcome, would be disproportionate against the benefits, and would be contrary to the overall aims of this project of creating a single balloon license issuing regime going forward.
  - b) Moreover, 'deeming valid' or anything similar would be unfair on the licence holders including about half of the PPL(BA)s who have already gone through the time and cost of converting their ANO licence to a BFCL licence/rating.

# Consultation questions

## Chapter 1: Scope and background

### Question

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

- Balloon flight crew licence holder or student
- Other GA aircraft flight crew licence holder or student eg PPL(A), PPL(H), NPPL(A) etc
- Other aviation flight crew licence holder including instructor/examiner
- Other aviation licence holder, eg other aircrew, air traffic controller, aircraft maintenance etc
- Aircraft operator or training organisation management
- GA-related industry, eg insurance, manufacturer, distributor. Please specify:  
\_\_\_\_\_
- Position within a government, regulatory or related body
- Position within an aviation representative or professional body
- Frequent passenger in a GA aircraft
- None of the above, but I consider myself affected by GA licensing; eg local resident, etc
- None of the above: I do not participate in this part of aviation, but have an interest in these issues

### Question

If you selected 'Balloon flight crew licence holder or student' in your answer to the previous question. Please tell us which one of these is your most advanced level attained (whether valid or not):

- Balloon student pilot
- Private balloon licence holder, eg PPL(BA) or BPL
- Commercial balloon licence/rating holder: CPL(B) or BPL commercial rating
- Balloon instructor (private or commercial)
- Balloon examiner (private or commercial)
- Prefer not to answer

**Question**

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

No      Yes: organisation: \_\_\_\_\_ [maximum 100 characters]

Please note that we would expect only one formal submission per organisation.

**Question**

Do you have any comments about our approach described above?

**Question**

Do you have any comments specifically about our conclusion regarding deeming valid ANO licences as their equivalent in Part-BFCL?

## **Chapter 2: Next steps and embedding the reforms**

**Question**

Do you have any comments on anything described in this chapter?

## **Chapter 3: Licensing for private ballooning**

**Question**

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)?

Yes      No      Undecided      No view/don’t know

Do you have any comments?

**Question**

Do you support our suggestion of removing the ATO/DTO requirement for training for a base BPL?

- Yes: Remove the ATO/DTO requirements from base BPL training
- No: Leave the ATO/DTO requirement unchanged, but explore alleviations for ballooning in the future DTO review
- No: leave the regulations unchanged
- Undecided
- No view/don’t know

Do you have any comments?

**Question**

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?

Yes      No      Undecided      No view/don't know

**Question**

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)?

Yes      No      Undecided      No view/don't know

You will be invited to add comments in a subsequent question

**Question**

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?

Yes      No      Undecided      No view/don't know

Do you have any comments on this proposal to remove the experience component and/or this consequential change to the training flight frequency?

**Question**

Do you agree with our approach of adjusting the existing recency requirements for additional classes in the base BPL licence requirements?

Yes      No      Undecided      No view/don't know

You will be invited to add comments in a subsequent question

**Question**

Do you think the period of time in which the flights must be done should be extended from 24 months to 48 months?

Yes      No      Undecided      No view/don't know

Do you have any comments?

**Question**

What are your views towards our approach of maintaining indefinitely PPL(BAs) already issued for flying Non-Part-21 balloons?

- Fully support this approach
- Against: all licences should convert to BPL by the deadline

- Undecided
- Not familiar enough with issue to comment or have a view

You will be invited to add comments in a subsequent question

#### Question

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

- Agree with this approach
- Against: PPL(BA) holders should not require refresher training
- Against: all licences should convert to BPL by the deadline
- Undecided
- No view/don't know

You will be invited to add comments after the next question

#### Question

What are your views towards us ceasing to issue new PPL(BA)s with effect from September 2025 given the complications described above?

- Agree with this approach.
- Disagree.
- Neither, I think all licences should convert to BPL by the deadline
- Undecided
- No view/don't know

Do you have any comments about PPL(BA)s for Non-Part-21 balloons?

### Chapter 4: Commercial balloon licensing

#### Question

Do you agree with our approach of introducing into the licensing regulation a 100-hour PIC experience requirement as a prerequisite for CPB privileges?

- Yes
- No – leave BFCL unchanged at 50hr
- Undecided
- No view/don't know

You will be invited to add comments in a subsequent question

**Question**

Do you agree with our proposal to introduce a stepped minimum number of PIC hours of CPB flying experience in the previous hot-air balloon size group before conducting CPB flights in the next group, in addition to the requirements for progression to the group under BFCL.150(b)?

Yes      No – leave BFCL unchanged      Undecided      No view/don't know

Do you have any comments?

**Question**

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?

Yes      No – leave BFCL unchanged      Undecided      No view/don't know

You will be invited to add comments in a subsequent question

**Question**

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 above?

Yes      No – leave BFCL unchanged      Undecided      No view/don't know

Do you have any comments?

**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)?

Yes      No – leave BFCL unchanged      Undecided      No view/don't know

You will be invited to add comments after the next question

**Question**

Do you agree with our proposal to introduce a requirement for CPB pilots to undertake ground refresher training every 5 years?

Yes      No – leave BFCL unchanged      Undecided      No view/don't know

Do you have any comments?

#### 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? Please choose one of the following options:

- A. 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.
- B. 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.
- C. Familiar with the issues but am undecided
- D. No view/don't know

Do you have any comments?

## Chapter 5: Instructor and examiner requirements

#### Question

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?

Yes            No – leave BFCL unchanged            Undecided            No view/don't know

Do you have any specific views on what should be covered in the training syllabus?

#### Question

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?

Yes            No – leave BFCL unchanged            Undecided            No view/don't know

**Question**

Do you agree with our approach of introducing an ‘Assistant Instructor’ authorisation (or another title to be determined), and changing the minimum required number of dual training flights and hours to be undertaken with a FI(B) to at least 4 hours and 4 flights (instead of 12 hours)?

Yes            No – leave BFCL unchanged            Undecided            No view/don’t know

Do you have any comments on this proposal?

**Question**

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)?

Yes            No – leave BFCL unchanged            Undecided            No view/don’t know

Do you have any comments?

**Question**

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:

- 1) 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);

Yes            No – leave BFCL unchanged            Undecided            No view/don’t know

**Question**

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:

- 2) Introduce a minimum 200 hours experience as PIC of CPB operations (when examining for the commercial operation rating and for commercial passenger ballooning proficiency checks);

Yes            No – leave BFCL unchanged            Undecided            No view/don’t know

**Question**

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:

- 3) Introduce a minimum 100 hours experience as PIC of CPB operations in the hot-air balloon group size being examined (when examining for the commercial operation rating and for commercial passenger ballooning proficiency checks).

Yes            No – leave BFCL unchanged            Undecided            No view/don't know

Do you have any comments?

**Question**

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?

Yes            No – leave BFCL unchanged            Undecided            No view/don't know

Do you have any comments?

**Question**

Do you agree with our approach to reword the regulations on the assessment of competence for examiners so that:

- 1) 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;

Yes            No – leave BFCL unchanged            Undecided            No view/don't know

**Question**

Do you agree with our approach to reword the regulations on the assessment of competence for examiners so that:

- 2) 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,

Yes            No – leave BFCL unchanged            Undecided            No view/don't know

Do you have any comments?

## Chapter 6: Theoretical knowledge changes

### Question

Do you agree with reducing the number of examinations by combining those subjects that can be brought together? Eg say Air Law and Communications.

Yes know	No – leave it unchanged	Undecided	No view/don't
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### Question

Do you agree with removing the requirement for the Head of Training at a training organisation to recommend the candidate for examinations?

Yes know	No – leave it unchanged	Undecided	No view/don't
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Do you have any comments on this?

### Question

Do you agree with amending the validity period of the examinations to change the 18-month period in which all examinations must be passed within to a rolling validity period?

Yes know	No – leave it unchanged	Undecided	No view/don't
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### Question

In the event that a student fails any one exam four times, is the requirement to retake all of the examinations again a factor in a student pilot stopping their course?

Yes	No	Undecided	No view/don't know
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Do you have any comments?

### Question

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?

### Question

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?

Yes know	No – leave BFCL unchanged	Undecided	No view/don't
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Do you have any comments about anything to do with the exam proposals?