

General Aviation Pilot Licensing Review Phase 2: Aeroplanes

Consultation Response Document

CAP3032A



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

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Enquiries regarding the content of this consultation should be addressed to: ga@caa.co.uk

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Executive Summary

This paper sets out the findings and key decisions arising from the second Licensing and Training Simplification consultation in the aeroplane category.

The consultation ran between 13 March 2024 and 22 May 2024 and elicited 640 unique responses.

Overall direction

Most of our proposals received a positive response and we have incorporated them into an Opinion and Instruction Document (OID) for the project, 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 all 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 aeroplanes will not be progressed until 2025, with implementation planned for 2026. This includes changes relating to:

- Theoretical knowledge procedures and validity periods;
- The aeroplane class rating system;
- Instrument rating and IMC rating.

Purpose and background

Purpose of this document

- 1.1 We published [CAP2974A](#) from 13 March 2024 to 22 May 2024 to publicly consult on the aeroplane proposals in the second phase of the Licensing and Training Simplification project.
- 1.2 We received a total of 640 responses to the aeroplane consultation. Most respondents answered the survey questions and a significant proportion also left supporting 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 Consultation 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. [CAP2974A](#) consulted on the detailed proposals for aeroplanes, including microlights. Similar consultations were also undertaken for balloons and airships, sailplanes, gyroplanes, and helicopters.
- 1.5 This work followed an earlier consultation [CAP 2335](#) in Autumn 2022. The 1,246 GA community responses¹ (summarised in [CAP 2532](#)) showed strong support in several key areas for updating our current legislation with regards to licensing and training.
- 1.6 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.

¹ 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/>

Scope

- 1.8 The consultation proposed changes to private pilot licences and associated ratings and certificates to act as pilot in command of aeroplanes, as defined by UK Part-FCL (flight crew licensing requirements within the assimilated [UK Aircrew Regulation \(EU\) No 1178/2011](#)) as 'engine-driven fixed-wing aircraft heavier than air which is supported in flight by the dynamic reaction of the air against its wings'.
- 1.9 This project does not cover the following areas:
- Commercial operations other than private pilot instruction. Pilot licences allowing commercial operations in aeroplanes, helicopters, and gyroplanes, including public transport and commercial air transport, as well as integrated flight training with the purpose of training from no previous experience to air transport licences are outside the scope of this project.
 - Private operations in complex aeroplanes and helicopters. Although operations in, for example, corporate aviation is technically part of the international general aviation definition, the specific characteristics and needs of the markets in which those aircraft operate mean that we regulate them separately.
 - Ratings and rating exemptions for historic/ex-military aircraft, as well as display pilot qualifications.
 - Unregulated activities such as non-Part 21 sailplanes and Self-Propelled Hang Gliders (also known as 'paramotors' or 'powered paragliders').
- 1.10 Note it is unlikely that the assimilated law (previously known as retained EU law) and the Air Navigation Order 2016 (ANO 2016) will be consolidated during the timeline of this project. A combination of changes to the assimilated law and ANO will be necessary to implement the proposals.

Chapter 2

ICAO PPL(Aeroplanes)

2.1 The proposals for the ICAO PPL(A) focused on three main areas:

- Making provision for a combined licence document that would include the privileges of a Part-FCL PPL(A) and a UK PPL(A) issued under the Air Navigation Order 2016;
- Revising the PPL(A) qualifying experience in line with ICAO Annex 1 requirements and crediting flight time previously gained on three axis microlight aeroplanes towards the total experience requirement for the PPL(A); and
- Consolidating the current nine PPL(A) theoretical knowledge exams into either seven or two papers.

Combined licence document

- 2.2 The proposal was to issue a combined Part-FCL and Air Navigation Order PPL(A) licence document, and therefore discontinue the issue of separate licences under the ANO.
- 2.3 Existing licence holders are unaffected by the proposal, and existing Part-FCL licences will continue to have class rating privileges on equivalent non-Part 21 aircraft.

Do you agree with our proposal to discontinue issuing new UK PPL (and higher) licences under the Air Navigation Order?

Option	Total	Percent
Yes	417	65.26%
No	44	6.89%
Undecided	62	9.70%
No view/don't know	67	10.49%
Not Answered	49	7.67%

Phase 2 Consultation Outcome – CAA Decision no.1:

We will progress a combined licence document format for the PPL(A).

PPL qualifying experience

2.4 Proposed changes to the qualifying experience requirements under FCL.210.A included:

- Introducing a 35-hour PPL course option for approved training organisations;
- Revising the standard qualifying experience requirement from 45 hours flight instruction to 40 hours as pilot of aeroplanes; and
- Crediting flight time previously gained on three axis microlights towards the overall experience requirement for the PPL(A).

There was also an open question about crediting flight time from sailplanes and other aircraft categories towards the PPL(A).

35-hour PPL course

Do you agree with including a 35-hour PPL option for students training at an ATO under an approved course of training?

Option	Total	Percent
Yes	402	62.91%
No	113	17.68%
Undecided	34	5.32%
No view/don't know	40	6.26%
Not Answered	50	7.82%

Discussion

2.5 Most respondents supported the proposal for a 35-hour PPL option. Concerns raised in the comments included:

- It may create false expectations for ab-initio students. Completion in 35 hours of flight time would be the exception rather than the norm, but flight schools may advertise a price based on minimum hours that would not be realistic in practice; and
- If only ATOs were permitted to offer a 35-hour course, this would place DTOs at a competitive disadvantage.

2.6 We agree that completion in 35 hours will not be realistic for most PPL students. However, it is not impossible and some students training full time during periods of benign weather may achieve 35 hours when accompanied by high motivation and aptitude.

- 2.7 Including the 35-hour option is also in line with our approach to aligning with the standards and recommended practices of ICAO Annex 1, and only deviating when there is a clear reason to.
- 2.8 We believe adoption for ATOs only is appropriate since this will enable improved oversight of the reduced course and is in line with the wording of ICAO Annex 1, which requires students to follow a “course of approved training” to qualify for completion in 35 hours. Whilst this may appear to cause a competitive disadvantage, ATOs will have invested more in evidencing compliance and obtaining approval to provide courses.
- 2.9 CAA guidance will emphasise that 35 hours is not normally a realistic training time and that an average student, particularly if training intermittently, will likely require a higher number of hours.

Phase 2 Consultation Outcome – CAA Decision no.2:

We will include a 35-hour PPL course option within our changes to FCL.210.A.

Standard qualifying experience

2.10 Key changes included:

- The requirement for ‘45 hours flight instruction in aeroplanes or TMGs’ becomes ‘40 hours flight time as a pilot of aeroplanes or TMGs’; and
- Removing the specific requirement for 25 hours dual instruction from the implementing rule (will be moved to the associated AMC/GM).

2.11 The primary driver for these changes included closer alignment with the ICAO text, and more flexibility for applicants with previous flight experience gained in aeroplanes, such that they need not necessarily have to complete the entire Part-FCL PPL(A) course.

Do you agree with our proposed changes to FCL.210.A(a) regarding the qualifying experience requirements for issue of a PPL(A)?

Option	Total	Percent
Yes	418	65.41%
No	49	7.67%
Undecided	60	9.39%
No view/don't know	63	9.86%
Not Answered	49	7.67%

Discussion

2.12 Most respondents supported the proposed changes to FCL.210.A(a) regarding the qualifying experience for the PPL(A).

2.13 Concerns raised included:

- Most PPL students already take more than 45 hours to complete a PPL;
- Reducing the minimum experience requirements may lead to a reduction in standards; and
- The proposed wording is less precise and may be more open to interpretation.

2.14 The main motivation for changing the wording is to allow more flexibility for PPL(A) students with previous flight time on aeroplanes. It is not the intention to reduce the number of flight hours that a typical ab initio student would take to complete a PPL(A).

2.15 The practical syllabus, which is set out in Acceptable Means of Compliance (AMC), will not be changing. We will also add material in the AMC and Guidance Material (GM) to address the circumstances in which a PPL(A) student has previous experience as a pilot of aeroplanes.

2.16 The removal of the specific requirement for 25 hours dual instruction from the text of the regulation is not intended to alter the typical amount of dual instruction received – further guidance will be included in AMC or GM to the regulation.

Phase 2 Consultation Outcome – CAA Decision no.3:

We will progress the proposed changes regarding qualifying experience.

Crediting flight time from other licences or aircraft categories

2.17 On this point we asked an open question as to whether we should make changes to FCL.210.A regarding crediting from other licences or aircraft categories.

What changes should we consider for experience crediting towards the PPL(A) from other licences, as set out in FCL.210 (b), (c) and (d)?

Discussion

2.18 Key points of the responses included:

- Improving the provision at FCL.210 (b) for crediting flight time gained with a LAPL(A), or other aeroplane flight time gained in training towards or under the privileges of another sub-ICAO licence, such as the NPPL(A); and
- Providing greater credit at FCL.210 (c) towards the PPL(A) for pilots holding sailplane licences.

2.19 A significant number of responses suggested the credit for sailplane licences could be increased, beyond that currently offered for SPL holders with TMG privileges already included in the licence. The UK credits for glider pilots prior to the introduction of JAR-FCL in 1999 were more generous than currently offered, so it may be desirable to examine this issue as part of future work.

Outcome

2.20 As a result of more closely aligning the wording of FCL.210.A with ICAO Annex 1, we plan to delete the specific upgrade course requirements for holders of the LAPL(A) set out in FCL.210.A(b). Existing LAPL(A) holders will be addressed in AMC, allowing flexibility depending on how much experience on aeroplanes the licence holder possesses and their individual training requirements.

2.21 ICAO Annex 1 allows national authorities to determine what credit from other aircraft categories may be counted towards the PPL(A). Currently this is set at 10% in FCL.210.A(d), except for balloon experience. We did not receive significant comments suggesting this was disproportionate, so will not change this provision.

Crediting of microlight aeroplane flight time

2.22 The crediting of microlight flight time was a common discussion point in the aeroplane working group, particularly when considering the pathways from the sub-ICAO licence to the PPL(A).

Where a PPL(A) student has previous microlight aeroplane flight time, should this count towards the PPL(A) qualifying experience?

Option	Total	Percent
Yes	531	83.10%
No	24	3.76%
Undecided	19	2.97%
No view/don't know	19	2.97%
Not Answered	46	7.20%

Discussion

2.23 The response to this was overwhelmingly positive, although many comments suggested that the credit should be limited to three axis microlight time.

2.24 Note that this would not permit a PPL(A) to be obtained by training on microlight aeroplanes but would allow time to be credited towards the overall 40 hours flight experience requirement.

Phase 2 Consultation Outcome – CAA Decision no.4:

We will progress changes to FCL.035(a) – crediting of flight time, to enable the credit of flight time previously obtained in three axis microlights.

Theoretical knowledge exams

2.25 The theoretical knowledge question focused on the number of exam papers applicable for the PPL(A). Options included changing the existing nine exams to either seven or two.

Option	Total	Percent
Combine exams into seven	312	48.83%
Combine exams into two	89	13.93%
No change to existing requirements	101	15.81%
Undecided	42	6.57%
No view/don't know	45	7.04%
Not Answered	50	7.82%

Discussion

2.26 This question was essentially a poll on the options. Most respondents favoured moving to seven exams.

2.27 Seven exams would strike an appropriate balance between consolidation and retaining a structure that allows PPL students to focus on studying for individual topics. The overall number of questions would remain the same, so moving to two exams might impose a higher burden on students.

2.28 In the event of moving to seven, Air Law would merge with Operational Procedures and elements of Flight Performance and Planning would be merged with Navigation and Aircraft General Knowledge.

Further work

2.29 We need to further assess the cost of making the associated changes with our third party eExams supplier. We hope to make a decision in this area towards the end of 2024.

Chapter 3

Class ratings and variant groups

3.1 The consultation focused on three main areas relating to class ratings and variant groups:

- Reflecting electric and hybrid technology in the existing Single Engine Piston (SEP) rating;
- Applying the variant groups associated with the SEP rating to the Multi-Engine Piston rating (MEP); and
- Potentially removing reference to propulsion system in the class rating system.

Expand SEP rating to include electric and hybrid technology

3.2 The consultation proposed an approach similar to that found in [EASA Opinion No 05/2023](#), published in October 2023. This would have involved defining “SEP aeroplane” as including one powered by either piston, electric or hybrid piston-electric engines.

Do you agree with revising the SEP class rating to incorporate pure electric and non-turbine hybrid-electric power plants, and introducing new variant groups to the class requiring differences training, covering pure-electric and hybrid-electric propulsion systems?

Option	Total	Percent
Yes, I support this option as described above, with pure-electric and non-turbine hybrid introduced as variant groups requiring formal differences training.	434	67.92%
Yes, I support this option, but we should limit hybrid technology to piston-electric only, as EASA have done.	70	10.95%
No, I don't think we should alter the current system of class ratings at this time.	30	4.69%
Undecided	15	2.35%
No view/don't know	31	4.85%
Not Answered	59	9.23%

Discussion

- 3.3 The response was largely in favour of incorporating electric and hybrid electric engines.
- 3.4 We believe that electric and hybrid electric aircraft should be incorporated into the current licensing system, with a requirement for differences training when moving from conventional piston engine aircraft.
- 3.5 We do not believe at this time that the level of training and testing required warrants a separate class or type rating for electric aircraft.
- 3.6 However, after further review we are unsure as to whether the EASA approach of essentially redefining “SEP” to include electric aircraft is the best way forward on this issue.
- 3.7 It may be confusing to incorporate reference to electric aircraft into “SEP”, when the term is associated specifically with piston aircraft. Other approaches we considered included a single engine “non-turbine rating” or removing reference to the propulsion system entirely.

Further work

- 3.8 We plan to look further at the class rating system in the future, so will not be making any major changes in this area as part of the first phase of legislative amendments planned for the spring of 2025.
- 3.9 Any changes would therefore likely be proposed for enactment in 2026. Existing electric aircraft and the associated training requirements will be addressed in a shorter timeframe via new guidance and exemptions as required.

Applying the variant groups from the SEP to the MEP class

- 3.10 Under the CAA [“Type and class rating endorsement list”](#) there is a requirement for differences training when moving between all types within the MEP class. This contrasts with the SEP class, for which there is only a requirement when the aircraft has additional features, such as a variable pitch propeller or retractable undercarriage.
- 3.11 We heard evidence in the aeroplane working group that the current situation was sometimes disproportionate, particularly with rarer types for which it may not be practical to find a suitably qualified instructor. It may be more proportionate to harmonise the requirements with those of the SEP class, such that differences training is only required when the type has a specific difference that the licence holder has not previously been trained on.

Do you agree with applying the variant groups from the SEP class rating to the MEP class rating, thus removing the need for differences training between every multi-engine type?

Option	Total	Percent
Yes, I support this approach.	389	60.88%
No, I don't think we should alter the treatment of multi-engine class ratings.	71	11.11%
Undecided	31	4.85%
No view/don't know	88	13.77%
Not Answered	60	9.39%

Discussion

3.12 Most respondents supported the proposal. Whilst we would always encourage pilots to receive dual instruction on any new type, we recognise this is not always possible with rarer aircraft.

Further work

3.13 We will look at relevant changes to the CAA type and class rating endorsement list to progress this proposal.

Wider reform of the class rating system

3.14 During the working group phase there were several proposals made beyond those described earlier:

- Extending the electric/hybrid technology approach described earlier into the MEP class;
- Further simplifying the single-engine rating, to include turboprop platforms that do not require a type rating, as well as electric and hybrid power. This would create Single-Engine (Land) and Single-Engine (Sea) ratings; and
- As above, but also applying the approach to multi-engine aircraft by creating Multi-Engine (Land) and Multi-Engine (Sea) ratings.

3.15 We did not present firm proposals on the above subjects, however we wished to gauge the appetite from the community for future work. Three further questions were asked to gather feedback in this area.

Do you agree that we should look further at the system of aeroplane class ratings, with a view to simplifying the single and multi-engine class ratings and potentially removing the whole reference to propulsion type from the class rating?

Option	Total	Percent
Yes	397	62.13%
No, I don't think we should alter the current system of class ratings	96	15.02%
Undecided	33	5.16%
No view/don't know	53	8.29%
Not Answered	60	9.39%

If you do agree that we should look further into the class rating system, which one of the following statements best describes your view?

Option	Total	Percent
I support extending the electric/hybrid technology to multi-engine, but any further changes would be inappropriate at this time.	221	34.59%
I think extending electric/hybrid technology to multi-engine would not go far enough. We should explore removing reference to the propulsion systems and any safety concerns could be mitigated.	279	43.66%
Not Answered	139	21.75%

Do you have any comments about the class rating system, including any further thoughts on the above choices, or suggestions for alternative approaches?

Discussion

- 3.16 Most respondents supported further exploring the issues around class ratings. There were many comments on this subject with a variety of views expressed.
- 3.17 Responses were mainly in favour of further simplification, although a significant number of comments also emphasised that it was important to ensure the quality and standardisation of training.
- 3.18 Key comments and themes included:

- The focus should be on simplification and differences training would be largely sufficient to accommodate propulsion system differences, provided guidance and standardisation was adequate.
- Turbine power or other propulsion systems could be addressed via a differences training requirement.
- The single engine turbine (SET) rating could be simplified – currently it is designated a class rating, but most individual aircraft models still need to be revalidated separately, meaning it is not really a class rating in practice.
- It seems inconsistent that differences training expires for the MEP class but not the SEP – currently for differences training outside the scope of the SEP or TMG class, further training is required if the licence holder has not flown the type within the last two years.
- Turbine engines are already used in gliders and potentially planned for some microlights and other light aircraft.
- The FAA system seems to produce similar safety outcomes and consists of single engine (SE) and multi engine (ME) class ratings that cover most aircraft up to 12,500 lbs (5,700 kg) MTOW.
- Making more use of differences training may lead to a lack of standardisation and allow knowledge gaps when instructors interpret what level of training is appropriate.
- Core knowledge of new propulsion systems, such as electric aircraft, is essential for safe flight.
- Ratings or training could be organised according to the overall power output of the propulsion system rather than the nature of the system.
- We should also take into consideration pilots moving from newer technologies to old – for example it would probably be harder to fly conventional piston engine aircraft when previous experience has only been on single power lever thrust systems.

Further work

3.19 There were many interesting comments on this subject. We will further review this area and potentially propose legislative amendments for the Spring of 2026.

Chapter 4

Sub-ICAO aeroplane licence

- 4.1 This chapter of the consultation presented our proposals for the sub-ICAO aeroplane licence. 'Sub-ICAO' refers to a pilot licence not issued in accordance with ICAO requirements and therefore not automatically accepted for flight outside the UK.
- 4.2 Currently the UK issues both the Part-FCL Light Aircraft Pilot's Licence (LAPL) and the National Private Pilot's Licence (NPPL) under the Air Navigation Order 2016.
- 4.3 The consultation presented a choice between a 'single sub-ICAO licence' (Option 1) that would combine the NPPL(A) and the LAPL(A), and a second option (Option 2) in which the two licences would remain separate, albeit new NPPL(A) licences would only be issued to fly microlight aeroplanes.
- 4.4 Most of the questions posed related to Option 1 since this option presented several decisions to be made regarding the possible characteristics of the revised licence. Option 2 presented a smaller number of changes from the status quo.

Flight training syllabus

- 4.5 The first element of Option 1 presented was the flight training syllabus, in which we put forward a proposal to consolidate the syllabi of the NPPL(A) and LAPL(A), resulting in a single syllabus that could be adapted for different aeroplanes within the scope of the licence.

Do you agree with our approach to the flight training syllabus for the sub-ICAO licence?

Option	Total	Percent
Yes	446	69.80%
No	25	3.91%
Undecided	52	8.14%
No view/don't know	63	9.86%
Not Answered	53	8.29%

Discussion

- 4.6 Most respondents agreed with our approach and the comments were supportive of bringing the existing syllabi closer together. Comments questioning or cautioning against the proposals included:

- There were some concerns expressed about standards of training under the current microlight system compared to Part-FCL;
- Integrating the current syllabi would require a lot of effort for marginal benefit; and
- Would training towards the sub-ICAO licence be required to be undertaken at a DTO?

Outcome

- 4.7 Having reviewed the responses, we believe that our approach to the syllabus is appropriate, and we will work towards implementation as proposed.
- 4.8 In response to the question regarding the potential requirement for an ATO or DTO for the sub-ICAO licence, we do not believe it necessary to require this, but will keep this subject under review as we develop the training and theoretical knowledge material for the revised licence.

Class rating requirements

- 4.9 As described in the consultation, we propose that the three classes within the sub-ICAO licence be microlight, SEP and TMG. We believe it appropriate to retain a licence endorsement for each class, to ensure visibility of class privileges.
- 4.10 It was proposed that training with an instructor, rather than a skills test with an examiner, would be adequate when adding additional class privileges to the licence. Initial licence issue would always require a skills test.

Do you support a skills test or differences training when moving between class privileges within the sub-ICAO licence?

Option	Total	Percent
Differences training	476	74.49%
Skills test	71	11.11%
Undecided	17	2.66%
No view/don't know	24	3.76%
Not Answered	51	7.98%

Discussion

- 4.11 Most responses supported differences training. Comments supporting a skills test in some circumstances often cited similar reasons to those in the context of the class rating discussion, that differences training may not be adequately standardised.

Outcome

4.12 Having reviewed the responses, we believe that training (rather than a skills test) should be adequate for moving between the aeroplane classes within the scope of the licence. This is dependent on the initial licence skill test being of an appropriate standard and clear requirements for the training when moving between classes. We will further review this issue during the development of the revised sub-ICAO licence syllabus.

Rating validity

4.13 The existing sub-ICAO licences have different requirements for maintaining class privileges. The LAPL(A) has a 'rolling' system and the NPPL(A) fixed validity periods.

Do you support a fixed or rolling validity period for the privileges of the sub-ICAO licence?

Option	Total	Percent
Fixed	261	40.85%
Rolling experience and refresher training	200	31.30%
Rolling refresher training only	55	8.61%
Undecided	34	5.32%
No view/don't know	37	5.79%
Not Answered	52	8.14%

Discussion

4.14 By a relatively small margin, most respondents were in favour of a 'fixed' validity system. This would mean class rating privileges would be valid for a two-year period from the date of initial issue or previous revalidation, with an endorsement in the certificate of revalidation to this effect.

4.15 A rolling system would have been similar to that for the existing LAPL licence, in which the licence holder has to 'look back' from the date of a proposed flight, to ensure that within the two-year period, the required flight experience and training has been completed.

4.16 From a safety or administrative point of view, we do not see a strong case for one approach verses the other. Opinion is normally divided on this topic, and the requirements vary across different aircraft categories – fixed validity is currently more common for aeroplanes and helicopters, but sailplane and balloon licences make more use of rolling.

4.17 Fixed validity requires the certification of experience, or a proficiency check, by an examiner, which is not required when rating validity is rolling. Some pilots may find this to be a minor administrative burden, but it carries the advantage of the validity date being stated in the licence document, without the need to 'count back' through logbook records to establish compliance with a rolling requirement.

4.18 We also considered the views expressed in Chapter 5, which addressed rating validity in more detail. A strong message from the responses to Chapter 5 was that the ICAO and sub-ICAO licences should have the same validity system.

Phase 2 Consultation Outcome – CAA Decision no.5:

We will adopt a fixed validity system for the sub-ICAO licence, including existing LAPL(A) holders, who will have to convert to the fixed validity system in a manner that will be communicated in due course.

Theoretical knowledge

4.19 It was proposed to use the existing microlight syllabus as the basis for the revised sub-ICAO theoretical knowledge requirements. Most responses supported this approach.

Do you agree that the existing microlight theoretical knowledge syllabus provides an adequate basis for the proposed sub-ICAO licence?

Option	Total	Percent
Yes	321	50.23%
No	64	10.02%
Undecided	42	6.57%
No view/don't know	159	24.88%
Not Answered	53	8.29%

Discussion

4.20 Comments included:

- The microlight and PPL(A) exams should be the same;
- Some areas of the microlight syllabus are in need of updating and do not necessarily reflect the nature of modern three axis machines or other similar light aircraft;
- Compared to the Part-FCL aeroplane exams, there are some weaknesses and omissions in the current microlight papers, for example aircraft performance and weight and balance;

- The emphasis should be on ‘basis for’ – the microlight exams are currently quite specific to microlights in some areas and would have to be generalised to an extent if covering all aircraft under the sub-ICAO licence;
- The comparison between the sub-ICAO licence and the ICAO PPL(A) must be considered, to ensure there is a natural progression that avoids duplication and matches knowledge and privileges; and
- The proposal to also allow the use of the existing PPL(A) exams at sub-ICAO level may present more complexity by giving applicants a choice they find confusing.

Outcome

4.21 We believe that our proposed approach is appropriate, although there is a need for further review of the existing microlight exams to ensure that all appropriate learning objectives are captured. We will work with the relevant members of the GA community to progress this.

4.22 We do not believe it is currently practical to fully combine the ICAO PPL(A) and microlight exams, however closer alignment is the intention.

Operational limitations

4.23 Historically the UK has issued licences with operational limitations to microlight pilots who have not completed the full course towards the issue of an NPPL(A) with microlight class rating.

4.24 With advancements in microlight aeroplane performance, the use of operational limitations has declined. However, we proposed to retain the provision but not expand it beyond training with microlights.

Do you agree that we should not expand the concept of operational limitations beyond the microlight category?

Option	Total	Percent
Yes	335	52.43%
No	54	8.45%
Undecided	72	11.27%
No view/don't know	123	19.25%
Not Answered	55	8.61%

Outcome

4.25 Most responses agreed with our suggestion to keep operational limitations unique to the microlight aeroplane class.

4.26 We believe that as the performance of three axis microlights and other light aircraft has increased over the years, the relevance of operational limitations has steadily declined. However, we have not received any evidence that the provision should be removed, so will maintain the status quo.

IMC rating

4.27 It was proposed to allow the addition of the IMC rating to the sub-ICAO licence.

Do you agree that we should allow the IMC Rating/Instrument Rating (Restricted) to be added to the NPPL(A) and LAPL(A) licence?

Option	Total	Percent
Yes	498	77.93%
No	61	9.55%
Undecided	16	2.50%
No view/don't know	13	2.03%
Not Answered	51	7.98%

Discussion

4.28 Most responses were in favour of allowing the addition of the IMC rating to the sub-ICAO licence.

4.29 There was a concern expressed that by allowing the IMC rating on the sub-ICAO licence, this would create more complexity compared to it only being available for the PPL(A) or higher licences.

4.30 Note that there are currently no microlights certified for flight in IMC, so it would not be permitted to make use of the rating in microlight aeroplanes (or any aircraft not certified for flight in IMC), unless in an emergency.

Outcome

4.31 On balance we believe that the potential safety benefit of allowing an instrument qualification to be added to the sub-ICAO licence outweighs concerns about increasing the complexity of the licensing system, so we will adopt the proposal.

Medical requirements

4.32 The proposed medical standard for the sub-ICAO licence is the Pilot Medical Declaration (PMD), which would be in line with the existing NPPL(A) requirements.

Do you agree that we should allow pilot medical declarations to be made for the initial issue of the sub-ICAO licence?

Option	Total	Percent
Yes	454	71.05%
No	102	15.96%
Undecided	22	3.44%
No view/don't know	10	1.56%
Not Answered	51	7.98%

Outcome

4.33 Initial issue of the NPPL(A) with a pilot medical declaration is already permitted, so we believe this is also appropriate for the revised sub-ICAO licence.

Phase 2 Consultation Outcome – CAA Decision no.6:

Pilot medical declaration will be acceptable for the initial issue of the revised sub-ICAO licence.

Licence title

4.34 In the first consultation, we proposed naming the sub-ICAO licence as the 'PPL (Light)'. Subsequent discussion in the working group suggested there may be limited benefit in a new licence title, unless we wished to make a significant departure from existing requirements.

4.35 Choosing an existing title would have the benefit of applying changes to existing holders of the same licence, without needing to change the licence document.

How do you think the revised sub-ICAO licence should be titled?

Option	Total	Percent
LAPL	130	20.34%
NPPL	198	30.99%
PPL (Light)	149	23.32%
Other (please specify below)	32	5.01%
No view/don't know	71	11.11%
Not Answered	59	9.23%

4.36 Considering the responses to the consultation and the number of existing licence holders, we will use the 'NPPL(A)' title for the revised sub-ICAO licence.

Phase 2 Consultation Outcome – CAA Decision no.7:

The revised sub-ICAO licence will be titled the National Private Pilot's Licence (Aeroplanes).

Option 1 or 2?

4.37 As described at paragraph 4.3, the consultation presented two options around the sub-ICAO licence.

Which option for the revised sub-ICAO licence would you support?

Option	Total	Percent
Option 1: single sub-ICAO licence	478	74.80%
Option 2: retain both the NPPL(A) microlight class rating and LAPL(A), and discontinue NPPL(A) with SSEA and TMG class ratings	49	7.67%
Undecided	24	3.76%
No view/don't know	37	5.79%
Not Answered	51	7.98%

4.38 Most respondents were in favour of the single sub-ICAO licence, which was the CAA preferred option.

4.39 We believe that a single sub-ICAO licence is the best way forward and will provide more clarity for stakeholders in the future.

Phase 2 Consultation Outcome – CAA Decision no.8:

We have decided to adopt a revised NPPL(A) as the basis for the UK sub-ICAO licence. This will be adopted in the manner described in Chapter 4 of the consultation, with microlight, SEP and TMG class ratings.

Existing licence holders

4.40 Our approach to existing licence holders is to minimise impact.

4.41 In the consultation we stated that if option one is adopted, we would assign a common title for the sub-ICAO licence.

4.42 Holders of existing sub-ICAO licences with a different title could be considered equivalent, such that any changes would apply, without having to exchange the licence document.

Do you agree with our approach to existing licence holders?

Option	Total	Percent
Yes	428	66.98%
No	22	3.44%
Undecided	62	9.70%
No view/don't know	71	11.11%
Not Answered	56	8.76%

Outcome

4.43 Since we are adopting Option 1, the following will apply to existing licence holders:

- Existing SSEA ratings endorsed on an NPPL(A) will be deemed to be an SEP rating, although note that the maximum permitted take-off weight remains the same at 2,000 kg.
- A key difference is that the SEP rating will, subject to differences training, include the privileges of the microlight class rating and there will be no requirement to revalidate the two ratings separately.
- Existing SLMG class ratings will be deemed as TMG ratings – this change is nomenclature to align with Part-FCL and should not affect licence privileges in practice.
- Existing LAPL(A) licences will continue to be valid, however there will be a process to move them to a fixed validity system – details of this will be published in the future.
- The CAA will cease to issue new LAPL(A) licences after a certain date in 2025 – any training or exams towards the LAPL(A) prior to licence issue will be valid towards the issue of an NPPL(A) with SEP rating.

Chapter 5

Maintenance of privileges

5.1 This chapter addressed the following areas:

- The [exemption](#) that allows some microlight and SLMG pilots (ratings granted prior to February 2008) to revalidate their ratings with five hours flight experience in 13 months, without the need to fly with an instructor;
- The Acceptable Means of Compliance (AMC) associated with the biennial refresher training for the SEP and TMG ratings;
- Whether to remove the requirement for a certain amount of flight experience when maintaining the validity of the SEP, TMG or microlight class ratings; and
- Aligning the revalidation requirements across all three ratings mentioned above, for both ICAO and sub-ICAO licences.

Review of the ‘5 hours in 13 months’ revalidation exemption

5.2 In June 2023 the CAA received an Air Accidents Investigation Branch (AAIB) recommendation to review whether it is still appropriate to maintain this exemption.

5.3 The exemption is due to expire in September 2025, and we proposed in the consultation that we would not be renewing it in the future, since we believe routine exposure to refresher training is an important element of the pilot competence framework.

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

ie your class rating was issued prior to 1 Feb 2008, and you comply with 5 hours’ experience in 13 months, with no refresher training required.

Option	Total	Percent
Yes	90	14.08%
No	144	22.54%
Not applicable/don’t know	350	54.77%
Not Answered	55	8.61%

Would you object to requiring all microlight and SLMG class rating holders (regardless of date of issue) to comply with the requirement to undergo at least refresher training with an instructor every 24 months?

Option	Total	Percent
Yes	259	40.53%
No	238	37.25%
Undecided	19	2.97%
No view/don't know	72	11.27%
Not Answered	51	7.98%

Discussion

- 5.4 By a small margin, most respondents objected to imposing a refresher training requirement, which would be the effect of removing the exemption.
- 5.5 We noted that the number of responses to this question that selected 'Yes' was considerably more than the number that responded that they made use of the exemption.

Outcome

- 5.6 We are still reviewing the future of the exemption – we will communicate with potentially affected stakeholders later in 2024.

Refresher training review

- 5.7 The proposal was to adopt more extensive AMC material for the refresher training associated with the SEP rating and TMG ratings. Some text from the [EASA Opinion 05/2023](#) was shown as indicative of the possible approach.
- 5.8 The draft AMC included providing a selection of possible exercises to be undertaken during the refresher training, including stalling and partial or full power failure.

Do you support our approach to create Acceptable Means of Compliance and/or Guidance Material covering the conduct of Refresher Training?

Option	Total	Percent
Yes	457	71.52%
No	33	5.16%
Undecided	34	5.32%
No view/don't know	64	10.02%

Not Answered

51

7.98%

Discussion

5.9 Most responses supported the overall approach proposed.

5.10 Comments submitted were generally divided between those who supported a more prescriptive approach, and those who wanted wider discretion for the pilot and instructor to determine what training was appropriate.

5.11 Key points included:

- The training exercises in the draft AMC may not be appropriate for all pilots or aircraft, for example stalling in TMGs;
- Guidance Material (GM) may be more appropriate than AMC, since it would imply more individual discretion over the content of the refresher training;
- Instructors should be able to decline certifying the refresher training as complete if the pilot demonstrates a standard of flying that is obviously unsatisfactory;
- There should be more emphasis on a ground training element;
- The guidance material should be driven by safety data and the issues causing incidents and accidents in GA;
- There were a few answers relating to the five hours in 13-month experience exemption, with most suggesting that refresher training should not be required, unless there was evidence of a safety issue.

Further work

5.12 We believe the overall approach of providing more guidance on the contents of the refresher training is appropriate. There were many comments on this question that were clearly well informed and will provide good inspiration for refining the detail and format.

5.13 We will further review this area and provide proposals during the AMC consultation.

Experience requirements for revalidation

5.14 In this proposal we explored removing the experience requirement for revalidation of the SEP, TMG and microlight class ratings, and placing more emphasis on the biennial refresher training with an instructor.

Do you agree with this proposal of removing the experience element from the revalidation requirements?

Option	Total	Percent
Yes	145	22.69%
No	334	52.27%
Undecided	73	11.42%
No view/don't know	38	5.95%
Not Answered	49	7.67%

If we were to remove the experience element from the requirements to maintain validity of a class rating, which of the following do you think is most appropriate?

Option	Total	Percent
Undertake refresher training of at least one hour with an instructor, during the validity period	340	53.21%
Pass a proficiency check with an examiner during the validity period	170	26.60%
Familiar with the issues but am undecided either way	40	6.26%
No view/Don't know	31	4.85%
Not Answered	58	9.08%

Discussion

5.15 Most respondents were opposed to removing the experience element from the revalidation of the applicable ratings.

5.16 Key themes and comments included:

- Removing the experience requirement would result in pilots flying less, which would cause skill fade and be bad for safety;
- The FAA system does not require any flight experience and produces similar safety outcomes;
- Flight experience does not necessarily improve skills;
- If the flight experience element was removed, it would be necessary to make the refresher training more of a test, potentially allowing the instructor to require further training if felt necessary.

- 5.17 Most responses also favoured retaining the refresher training requirement, rather than moving to a proficiency check. Many qualified that if refresher training was to be the requirement, the instructor should be able to determine whether the pilot's flying was satisfactory or not.
- 5.18 Feedback from the consultation was against removing the experience requirement from the SEP, TMG and microlight class rating. There is no clear data either way as to whether a flight experience requirement contributes to safety.

Phase 2 Consultation Outcome – CAA Decision no.9:

We will retain the flight experience element of the revalidation requirements for the SEP, TMG and microlight class ratings.

Alignment of revalidation requirements

- 5.19 This proposal outlined how the existing revalidation requirements between the PPL(A), NPPL(A) and LAPL(A) could be aligned.
- 5.20 Currently there are slight misalignments between the PPL(A) and NPPL(A) in terms of when the hours may fall within the validity period of the licence.

Do you agree with the approach of having a single revalidation requirement across all single-engine non-turbine aeroplane class ratings for the sub-ICAO licence?

Option	Total	Percent
Yes	523	81.85%
No	25	3.91%
Undecided	16	2.50%
No view/don't know	25	3.91%
Not Answered	50	7.82%

Discussion

- 5.21 The feedback from this question was very positive.
- 5.22 The wording of the question could have been improved – the intention was to ask whether alignment should take place between ratings for both the ICAO and sub-ICAO, rather than only the sub-ICAO licence, however given the surrounding narrative and extensive written comments, we are confident that most consultees understood the question in the manner that it was intended.

Outcome

5.23 Considering the answers regarding flight experience, and those applicable to the sub-ICAO licence in Chapter 4, we have determined the revised revalidation requirements as follows for the SEP, TMG and microlight class ratings:

- Retain the overall requirement for 12 hours flight experience in the 24-month period of rating validity;
- Up to six hours may now be completed in the first 12 months of rating validity;
- The training flight may be completed at any time during the validity period of the rating.

5.24 The changes will apply to existing rating holders at the next point of revalidation. The revised requirements will also apply to existing SSEA and SLMG rating holders. The option to revalidate or renew via proficiency check remains unchanged.

5.25 The LAPL(A) will be moved onto a fixed validity system, in line with the PPL(A) and NPPL(A). The timeline for this will be communicated in the future.

Phase 2 Consultation Outcome – CAA Decision no.10:

We will align the revalidation by experience requirements for SEP, TMG and microlight class ratings across all licences.

Chapter 6

Theoretical knowledge: common elements

- 6.1 We considered the regulations associated with the theoretical knowledge examinations, with the aim of making it easier for training organisations to integrate them with the flight training and potentially less of a disincentive to complete the course.
- 6.2 In this chapter we addressed the following areas:
- Bringing the sub-ICAO licence exams into the eExams system;
 - The use of mobile devices and flight planning software in training;
 - Exam pass validity periods; and
 - Policy for multiple exam failures.

Sub-ICAO licence exams

- 6.3 As set out in Chapter 4 of the consultation, we propose to use the existing microlight exams as the basis for the theoretical knowledge of the revised sub-ICAO licence.
- 6.4 In line with our commitments to move services to digital platforms, we would look to bring the revised sub-ICAO examinations into the eExams system.

Do you agree that if we use the NPPL(A) Microlight syllabus and examinations, we should bring the sub-ICAO theoretical knowledge examinations into the eExams system?

Option	Total	Percent
Yes	309	48.36%
No	131	20.50%
Undecided	47	7.36%
No view/don't know	83	12.99%
Not Answered	69	10.80%

Further work

- 6.5 It is our intention to integrate all exams for the sub-ICAO licence into the eExam system, although there may be some technical challenges associated with this and the timeline will be determined as part of future work.

Mobile devices

- 6.6 We proposed to encourage the use of these devices as part of the theoretical knowledge training. We did not propose, at this time, to allow these systems to be used in the examinations for navigation and flight planning and performance.
- 6.7 We also proposed to encourage the use of mobile devices with flight planning and monitoring software, during the flight training exercises.
- 6.8 Student pilots will still need to know how to plan and monitor a flight using those basic principles and systems for the licence skill test.

Do you agree that we should encourage the use of mobile devices with flight planning and monitoring software during the theoretical knowledge training for navigation and flight performance and planning exercises?

Option	Total	Percent
Yes	519	81.22%
No	33	5.16%
Undecided	16	2.50%
No view/don't know	5	0.78%
Not Answered	66	10.33%

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

Option	Total	Percent
Yes	527	82.47%
No	26	4.07%
Undecided	14	2.19%
No view/don't know	5	0.78%
Not Answered	67	10.49%

Discussion

- 6.9 Most respondents supported the proposals. Key comments included:
- A very useful addition to traditional use of a paper chart.
 - This should not replace the traditional methods; it should be in addition to them. Need to know both methods in case of mobile device failure.

- Most new pilots will use electronic devices post licence issue therefore some form of training on them beforehand is essential.
- Moving maps contribute to flight safety and help to avoid infringements and possible airproxes.
- The use of mobile devices increases the risk of distraction in the cockpit.
- Training for mobile devices should be mandated rather than encouraged.

6.10 The feedback also showed that a proportion of training organisations and instructors already train students to use mobile devices, although many would not introduce the use of mobile devices unless it was mandated.

Further work

6.11 The comments demonstrated strong support for the proposals in this area. We will look to further progress work in this area during the next phase of the project.

Exam validity periods

6.12 We considered changing the 18-month period within which all examinations must be passed for the issue of the licence, to a rolling validity period. This would mean if an examination is passed more than 18 months ago, the candidate would not have to retake all the examinations again – only the examination(s) that fall outside of the 18-month period.

6.13 The 18-month validity period is not applicable to the current NPPL(A) microlight examinations, and we did not propose implementing such a requirement.

6.14 We also proposed amending the maximum period in which a completed set of examinations are valid towards the issue of a licence from the existing 24-month period to 36 months.

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

Option	Total	Percent
Yes	398	62.28%
No	76	11.89%
Undecided	34	5.32%
No view/don't know	58	9.08%
Not Answered	73	11.42%

Do you agree with amending the period in which a completed set of examinations are valid towards licence issue from 24 months to 36 months?

Option	Total	Percent
Yes	319	49.92%
No	186	29.11%
Undecided	34	5.32%
No view/don't know	34	5.32%
Not Answered	66	10.33%

Outcome

6.15 Most respondents supported our proposals in this area. It is our intention to progress the relevant changes as part of the second project phase.

Exam failures

6.16 With the data we are now collecting in the eExams system, we have seen a slight increase in the number of candidates who have failed to pass an examination within four attempts.

6.17 We found that many of those student pilots did not continue with their training towards a licence. We wanted to better understand why these student pilots are ceasing their training and if the requirement to retake all the examinations again was a factor. We therefore requested feedback from respondents as to their view.

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

Option	Total	Percent
Yes	256	40.06%
No	38	5.95%
Undecided	56	8.76%
No view/don't know	219	34.27%
Not Answered	70	10.95%

6.18 We also asked an open question to explore possible alternative approaches:

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?

Discussion

- 6.19 Of those respondents who had a view, most agreed that the requirement was a factor in people discontinuing their training.
- 6.20 On the open question, we had over 300 responses. The most common suggestion from respondents related to additional training prior to retaking the failed exam. Suggestions ranged from ground school at a training organisation or targeted training sessions with an instructor.
- 6.21 Another popular suggestion was an alternative method of testing for individuals who struggle with written examination conditions. Suggestions included oral exams and paper examination for those struggling with electronic exams.
- 6.22 Some respondents felt that the current rules were proportionate and that they are a way to ensure the correct calibre of pilots were getting through and gaining their licence, but others believed students should only have to retake the failed examination rather than having to retake the whole set.
- 6.23 A small number felt that there should be no limit to the number of attempts. Respondents commented that students are unable to gain a licence until all exams are passed and within the validity period and therefore what was the need for having a limit on the number of attempts.
- 6.24 Other suggestions included adapting teaching techniques, introducing a waiting period before attempting the exam again, moving to an alternative training provider and investigation into the root cause of students failing exams 4 times.

Further work

- 6.25 With strong support received for all three proposals, we will look to proceed with the implementation of these new requirements.
- 6.26 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.

Chapter 7

Instrument ratings review

7.1 This chapter covered the following areas:

- The Competency-Based Modular (CBM) training route for the IR(A);
- Proposal to remove the Enroute Instrument Rating (EIR) from the regulation;
- Requirements around the IMC rating (endorsed as ‘Instrument Rating (Restricted)’ on a Part-FCL licence).

7.2 We propose to withdraw the EIR, on the basis that we have issued three ratings in the approximately ten years since implementation. Transitional arrangements will be put in place, eventually requiring EIR holders to obtain another instrument qualification by 2027.

7.3 The IMC rating proposals included whether it should be required to be undertaken under the auspices of a training organisation, and whether to change the validity period from 25 months to 24 months, which would be more in line with other rating validity periods.

CBM IR requirements

7.4 The questions around the CBM IR training route addressed a possible review of the theoretical knowledge syllabus, and whether to allow DTOs to conduct the elements of the course that are required to be conducted at a training organisation.

7.5 The proposals followed on from UK involvement in the development of the Basic Instrument Rating² (BIR), while still a member of the EU.

7.6 We also asked a question regarding the validity period of the IR(A), proposing that we retain the current one-year validity period.

Theoretical knowledge

Do you agree that we should review the TK syllabus for the IR(A)?

Option	Total	Percent
Yes	238	37.25%
No	23	3.60%

² The UK has not implemented the Basic Instrument Rating, however it made a significant contribution towards its development and much of this work could be applicable to the CBM IR.

Undecided	32	5.01%
No view/don't know	253	39.59%
Not Answered	93	14.55%

Do you agree that we should consider consolidating the IR(A) examinations?

Option	Total	Percent
Yes	231	36.15%
No	35	5.48%
Undecided	48	7.51%
No view/don't know	232	36.31%
Not Answered	93	14.55%

Discussion

7.7 Of those who had a view, the vast majority supported a review of the theoretical knowledge requirements and the potential consolidation of the IR exams.

Outcome

7.8 We will take this work forward in the second phase of the project.

Training Organisations

7.9 We proposed that DTOs may be permitted to train for the IR via the CBM route, potentially subject to some additional requirements.

7.10 The additional proposed requirements included:

- Enhanced safety management, covering hazard identification and evidence of effective mitigations;
- More comprehensive follow up of safety and occurrence reports;
- Development of a training manual covering the IR(A) course; and
- Monitoring of adherence to the approved training programme for the IR(A).

7.11 We also asked a follow up question around allowing DTOs to conduct the refresher training for lapsed IR(A) ratings. Logically it would make sense to allow DTOs that complied with the requirements to teach the IR to also be able to provide refresher training to existing IR(A) holders.

Do you agree that we consider expanding the scope of the training courses offered by a DTO to include the flight training for the IR(A) via the competency-based route?

Option	Total	Percent
Yes	304	47.57%
No	30	4.69%
Undecided	21	3.29%
No view/don't know	191	29.89%
Not Answered	93	14.55%

Do you agree that if DTOs are permitted to offering the IR(A) course by the CB training route, they should be required to meet the additional requirements mentioned above?

Option	Total	Percent
Yes	225	35.21%
No	41	6.42%
Undecided	45	7.04%
No view/don't know	234	36.62%
Not Answered	94	14.71%

Do you agree that if DTOs are permitted to offering the IR(A) course by the CB training route, that we consider amending the renewal requirements for the IR(A) to allow the assessment and any refresher training required to be delivered by a DTO that has declared to deliver the IR(A) course?

Option	Total	Percent
Yes	294	46.01%
No	13	2.03%
Undecided	19	2.97%
No view/don't know	220	34.43%
Not Answered	93	14.55%

Discussion

7.12 Most responses were in favour of allowing the CBM IR to be undertaken at a DTO, albeit most also agreed with there being some additional requirements associated with this.

Outcome

7.13 We will review this area as part of the second project phase.

IR validity period

7.14 As a final question on the IR(A), we proposed that the validity period should remain at one year.

Do you agree that we should keep the validity period of the IR(A) to 1 year?

Option	Total	Percent
Yes	199	31.14%
No	105	16.43%
Undecided	47	7.36%
No view/don't know	196	30.67%
Not Answered	92	14.40%

Outcome

7.15 Of those that had a view, most respondents agreed that the validity period of the IR should remain at one year. Had the results been different, we would have considered revisiting the question of validity period.

Enroute Instrument Rating

7.16 The Enroute Instrument Rating was introduced in 2014, as part of the same package that introduced the CBM IR(A) training route. The rating has not proved to be very popular, and in 2019 EASA proposed to discontinue the rating. EU legislation was subsequently passed to remove the EIR.

7.17 We believe that given the very low uptake in the UK (three issued in ten years), it is also appropriate to discontinue the rating in UK Part-FCL and implement transitional arrangements for existing rating holders.

Do you agree with removing the EIR from the regulations and the transitional arrangements set out in paragraph 7.41?

Option	Total	Percent
Yes	203	31.77%
No	17	2.66%
Undecided	45	7.04%
No view/don't know	278	43.51%
Not Answered	96	15.02%

Discussion

7.18 Of those that had an opinion, most consultees supported our proposal. Most of the written comments also supported removal of the EIR, although a small number did voice support for its continued retention.

Outcome

7.19 Given the low uptake of the EIR, and our undertaking to further review the CBM IR requirements, we believe it is appropriate to withdraw the EIR. Existing rating holders would have until January 2027 to obtain another instrument qualification. Legislation to discontinue the EIR will be brought forward in the future.

IMC rating

7.20 Our questions regarding the IMC rating and Instrument Rating (Restricted) addressed whether it should be a requirement for the rating course to be conducted at a training organisation (ATO or DTO), and whether we should adjust the rating validity period from 25 to 24 months.

7.21 The rationale for requiring the involvement of a training organisation would be better standardisation and oversight of training standards.

7.22 Changing the validity period to 24 months would be to standardise with other ratings – most are valid for either 12 months, or multiples of 12 such as 24 or 36.

7.23 We also took the opportunity to inform consultees that the rating syllabus is currently being updated, including the theoretical knowledge exams and skills test guidance incorporating performance-based navigation (PBN). This is planned for publication in 2025.

Do you agree that we should require the delivery of the IMC/IRR Rating within either an ATO or DTO?

Option	Total	Percent
Yes	244	38.18%
No	103	16.12%
Undecided	28	4.38%
No view/don't know	172	26.92%
Not Answered	92	14.40%

Do you agree with our proposal to change the validity period of the IMC/IRR rating from 25 to 24 months?

Option	Total	Percent
Yes	214	33.49%
No	93	14.55%
Undecided	37	5.79%
No view/don't know	202	31.61%
Not Answered	93	14.55%

Discussion

7.24 Most respondents were in favour of both proposals.

Outcome

7.25 It is planned to enact the relevant changes to the IMC rating as part of the second phase of the project.

Chapter 8

Other issues

8.1 This chapter addressed the following areas:

- Views on possible improvements to flight instructor theoretical knowledge;
- The future of the aerobatic rating;
- The future of the sailplane towing rating; and
- The use of non-Part 21 aircraft for training.

8.2 There was also an opportunity to add additional comments around the subject area – we received many interesting and worthy suggestions, some of which we will take under consideration for the second wave of legislative changes.

Flight Instructor theoretical knowledge

8.3 It will remain a requirement for PPL instructors to have CPL knowledge, however there may be more proportionate means to deliver this requirement in practice. We asked an open question regarding how we might reform and improve the theoretical knowledge requirements for the flight instructor certificate:

We would appreciate your views on how we can improve the prerequisite theoretical knowledge, course teaching, learning and theoretical knowledge instruction requirements for the FI.

Discussion

8.4 Key comments included:

- Replace the existing CPL knowledge requirement with a more targeted package that could meet the ICAO requirement.
- The current CPL exams are too onerous and contain information relating to non-piston aircraft that could be removed.
- There should be more credit for FI(A) applicants who have previous instructing experience from other areas, such as military or transport category aircraft.
- CPL knowledge passes from other ICAO contracting states should be recognised.
- Theoretical knowledge requirements for microlight instructors could be improved.

- We should wait until more clarity from ICAO/EASA work in this area – [EASA RMT.0194](#).
- Ground training should include additional time for applicants without CPL knowledge and be included in ATO course progress tests.
- CPL knowledge can be assessed by the Flight Instructor Examiner during the Assessment of Competence.

Further work

8.5 A review of the theoretical knowledge requirements for flight instructors will be included in a further phase of the project.

Aerobatic rating

8.6 We asked whether the aerobatic rating should remain a requirement.

Should an aerobatics rating be required for all licence holders conducting this activity?

Option	Total	Percent
Yes	253	39.59%
No	235	36.78%
Undecided	40	6.26%
No view/don't know	44	6.89%
Not Answered	67	10.49%

Discussion

8.7 By a small margin, most respondents were in favour of the aerobatic rating. Written comments were largely divided between:

- There was no safety basis for introducing the rating in the first place, so can be removed; and
- Aerobatics requires training to be conducted safely, and the presence of a rating supports this.

8.8 A review of safety data since 2000 suggests a gradual reduction in fatal and serious injury accidents involving aerobatics. It is not clear to what extent this relates to the aerobatic rating – the rating first appeared in the EASA Aircrew Regulation in 2012, although it was not until April 2018 that the requirement to hold a rating was in force in the UK.

8.9 In most accidents involving aerobatics, the pilot is normally quite experienced and has previously demonstrated competence in the relevant manoeuvres. A significant

proportion happen at airshows or associated practice where the flying is at low level and margins for error are reduced, so even experienced and well-trained pilots sometimes make aircraft handling errors.

- 8.10 Amongst recreational aerobatic accidents that occurred prior to the requirement for an aerobatic rating, most pilots involved also appear to have completed adequate training.
- 8.11 However, we did identify three fatal accidents between 2000 and 2012 in which pilots may have attempted aerobatics without having completed training equivalent to the aerobatic rating. In all cases some training had been undertaken, however the pilots had apparently attempted manoeuvres for which they had either not demonstrated competence or at a lower altitude than recommended.
- 8.12 Since 2012 there have been a further handful of fatal aerobatic accidents, however none in which a lack of pilot training was believed to be an issue, and the general safety trend in this area is improving.
- 8.13 We believe that retaining the aerobatic rating is appropriate, although we will remove the prerequisite experience requirement for the rating, since we do not believe it serves a useful purpose.
- 8.14 Where there is a difference between the requirements for Part-FCL and national licence holders, we intend to align with a single policy. Pilots holding a licence first issued under the Air Navigation Order after September 2025 will therefore be required to hold an aerobatic rating, prior to conducting aerobatic manoeuvres as pilot in command.

Phase 2 Consultation Outcome – CAA Decision no.11:

The aerobatic rating will become a requirement for holders of new licences issued under the Air Navigation Order 2016, provisionally after 30th September 2025.

Sailplane towing rating

- 8.15 We asked whether the sailplane towing rating should remain a requirement.

Should a sailplane towing rating be required for all licence holders conducting this activity?

Option	Total	Percent
Yes	214	33.49%
No	269	42.10%
Undecided	29	4.54%
No view/don't know	72	11.27%

Not Answered	55	8.61%
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Discussion

- 8.16 By a relatively small margin, most believed that a rating for sailplane towing should not be necessary. Many comments pointed out that prior to EASA there was no requirement for a sailplane towing rating, and that there is no safety evidence to suggest that the rating had improved safety.
- 8.17 A review of safety data could not find any evidence that the rating had improved safety. An obvious reason for this is that the British Gliding Association managed the competence of tow pilots through their own training regime, and there is no evidence to suggest this was inadequate.

Phase 2 Consultation Outcome – CAA Decision no.12:

We will remove the requirement for a sailplane towing rating. The rating for banner towing will remain.

Use of non-Part 21 aircraft for Part-FCL training

- 8.18 In 2019 EASA introduced requirements into the Aircrew Regulation applicable to non-EASA aircraft (known as non-Part 21 aircraft in UK assimilated law) when used for Part-FCL training.
- 8.19 The requirements are set out in DTO.GEN.240 and ORA.ATO.135 of the Aircrew Regulation. These include a safety assessment and authorisation from the relevant competent authority. This mostly affects permit aircraft, although non-Part 21 aircraft with a certificate of airworthiness must also comply.
- 8.20 It is also a requirement that non-Part 21 aircraft with a permit to fly have a permission under Article 42 of the Air Navigation Order to be used for a commercial purpose. Many permit aircraft are covered by a general permission for flight training on a commercial basis, currently [ORS4 1585](#).
- 8.21 We proposed that it may be more straightforward to regulate the use of permit aircraft for training solely via Article 42, rather than also applying additional requirements via the Aircrew Regulation.

Do you believe any additional requirements for ATOs or DTOs should apply for using non-Part 21 aircraft, above those required for permit aircraft under ANO article 42?

Option	Total	Percent
Yes	33	5.16%
No	267	41.78%

Undecided	47	7.36%
No view/don't know	218	34.12%
Not Answered	74	11.58%

8.22 Of those that had a view, the vast majority supported the suggestion. Many of the written comments cited the fact that the CAA had not put in place a process to issue an authorisation, and that this had proved a blocker to activity.

Outcome

8.23 We intend to redraft DTO.GEN.240 and ORA.ATO.135, such that to use a non-Part 21 aircraft with a permit to fly, the requirements will be:

- The aircraft must have a permission (general or individual) under Article 42 of the Air Navigation Order.

8.24 There will not be a separate approval under DTO.GEN.240 or ORA.ATO.135, but Heads of Training at ATO or DTO are still responsible to ensure that the aeroplane is suitable for flight training and have documented the assessment in accordance with any procedures set out in their ATO manuals or equivalent documents.

Phase 2 Consultation Outcome – CAA Decision no.13:

Where a non-Part 21 aircraft has a Certificate of Airworthiness or permission for commercial operations under Article 42 of the Air Navigation Order, there will not be a requirement for a separate CAA safety assessment of the aircraft before use at an ATO or DTO.

Chapter 9

Proposed AMC on partial power failure

- 9.1 In this chapter we discussed a proposed change to the PPL(A) and sub-ICAO aeroplane licence syllabus that would improve pilot handling of partial power failure situations. This followed several recent accidents in which the outcome might have been improved by specific training in partial power scenarios.

Do you agree with the proposed addition to the syllabus to cover partial power failure situations in aeroplanes?

Option	Total	Percent
Yes	498	77.93%
No	18	2.82%
Undecided	12	1.88%
No view/don't know	21	3.29%
Not Answered	90	14.08%

- 9.2 Of those who had a view, the vast majority supported the proposal to include a partial power loss scenario in initial and recurrent training. Most of the written comments were supportive, and many noted that this was already identified in the microlight syllabus.
- 9.3 We will include relevant AMC material in the forthcoming AMC consultation later this year.

Chapter 10

Next steps

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

10.2 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.

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

10.4 Due to the volume of work and resource constraints in the legislative programme, some areas of policy relating to aeroplanes will not be progressed until 2026. These include changes relating to:

- Theoretical knowledge procedures and validity periods;
- The aeroplane class rating system;
- Instrument rating and IMC rating.

APPENDIX A**Abbreviations**

AAIB	Air Accidents Investigation Branch
AMC	Acceptable Means of Compliance
ANO	Air Navigation Order
AOC	Air Operator's Certificate
AOPA	Aircraft Owners & Pilots Association
ATO	Approved Training Organisation
BGA	British Gliding Association
BIR	Basic Instrument Rating
CBIR(A)	Competency-Based modular Instrument Rating (Aeroplanes)
CRD	Consultation Response Document
DTO	Declared Training Organisation
EASA	European Union Aviation Safety Agency
EIR	En-route Instrument Rating
FCL	Flight Crew Licensing
FRTOL	Flight Radio Telephony Operators Licence
GA	General Aviation
ICAO	International Civil Aviation Organisation
IFR	Instrument Flight Rules
IMC	Instrument Meteorological Conditions
IR	Instrument Rating
IR(R)	Instrument Rating (Restricted)
LAA	Light Aircraft Association
LAPL	Light Aircraft Pilot Licence
MEP	Multi-Engine Piston
MET	Multi-Engine Turboprop

NPA	Notice of Proposed Amendment
NPPL	National Private Pilot Licence
PBN	Performance-Based Navigation
PMD	Pilot Medical Declaration
PPL	Private Pilot Licence
RNP	Required Navigation Performance
SARPs	Standards & Recommended Practices (ICAO Annexes)
SE	Single-Engine
ME	Multi-Engine
SEP	Single-Engine Piston
SET	Single-Engine Turboprop
SLMG	Self-Launching Motor Glider
SPL	Sailplane Pilot Licence
SSEA	Simple Single-Engine Aeroplane
TMG	Touring Motor Glider
VFR	Visual Flight Rules
VMC	Visual Meteorological Conditions