

General Aviation Pilot Licensing Review

'Wave 2' proposals

A consultation

CAP 3132



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Please reply to this consultation via our website: <https://consultations.caa.co.uk> by **8th August 2025**.

Please direct enquiries regarding the content of this publication to: ga.consultations@caa.co.uk

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Contents

Contents	3
Introduction	4
Chapter 1 – Crediting of flight time	6
Chapter 2 – Theoretical knowledge validity	7
Chapter 3 – Revalidation of single engine ratings	9
Chapter 4 – Balloon regulation	14
Chapter 5 – Instrument rating	15
Chapter 6 – Other issues	17
Abbreviations	19

Introduction

1. In 2024 and 2025, we conducted several consultations arising from the GA Licensing Review, as detailed at [Licensing & training simplification | UK Civil Aviation Authority](#). The changes associated with these consultations are anticipated to come into force in October 2025.
2. This consultation includes additional proposals arising from the review, planned for implementation in 2026. Where proposals were originally stated in the consultation of [Spring 2024](#), we have included updates on how we intend to progress these.
3. The proposals largely relate to UK Regulation (EU) 1178/2011 (“the UK Aircrew Regulation”). A small number of changes are also proposed for UK Regulation (EU) 2018/395 (“the UK Balloon Regulation”).
4. Where appropriate, indicative draft changes to the text of regulation are included. This is indicated by a track changes format as follows:
 - New text in **grey highlight**;
 - Deleted text by **strikeout**.
5. Where appropriate, links to the text of existing regulations in the [Aviation Regulatory Library](#) have been included.
6. Questions to obtain feedback on the changes are included throughout the document, please submit responses via the online response tool.
7. The consultation closes on **8th August 2025**. The outcome will assist the finalisation of any changes to regulation. Associated changes to acceptable means of compliance (AMC) and Guidance Material (GM) would be subject to further consultation.

About you

Question 1:

What is your name?

Question 2:

What is your email address?

Question 3:

Please indicate if you participate in aviation and in what capacity (select all that apply):

- GA aeroplane flight crew licence holder or student: PPL(A), NPPL(A), LAPL(A)
- GA aeroplane instructor or examiner
- Other GA aircraft flight crew licence holder or student e.g. PPL(BA), PPL(H), BPL, SPL etc
- Other aviation flight crew licence holder including e.g. CPL(A), ATPL, military
- Other aviation licence holder, e.g. other aircrew, air traffic controller, aircraft maintenance etc
- Aircraft operator or training organisation management
- GA-related industry, e.g. 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; e.g. local resident, etc
- None of the above: I do not participate in this part of aviation, but have an interest in these issues

Question 4:

Is your response the formal submission of an organisation?

- No
- Yes: organisation: _____

In most cases, we would expect only one submission per organisation.

Chapter 1

Crediting of flight time

Microlight aeroplanes

- 1.1 Amendments to the UK Aircrew Regulation coming into force later this year will allow a larger proportion of flight time on three axis microlight aeroplanes to be credited towards the issue of a Private Pilot's Licence (Aeroplanes).
- 1.2 As a further proposal for 2026, we are considering extending the crediting of three axis microlight flight time towards the experience requirements for the commercial pilot's licence (CPL) gained via the modular course – for example, as described in [Appendix 3, section E of Part-FCL](#).

Question 5:

Do you support the crediting of three axis microlight flight time towards the flight experience requirements for the CPL modular course? Please enter any comments or proposals you wish to make.

Sailplanes

- 1.3 Feedback from the consultation in 2024 indicated a desire for us to further review the experience credits towards the PPL(A) available for pilots with flight time on sailplanes. Currently holders of a sailplane licence (SPL) may be credited with 10% of their flight time as PIC in sailplanes, up to a maximum of 10 hours.
- 1.4 An SPL holder with TMG privileges is currently required to have 24 hours of flight time on TMGs post gaining TMG privileges and complete a 15-hour PPL course at an ATO or DTO. This route currently ensures a minimum experience of 45 hours on a combination of TMG and aeroplanes. We will reduce this minimum to 40 hours, in line with the other amendments to [FCL.210.A](#) planned for 2025.
- 1.5 For holders of an SPL without TMG experience, we are also open to adopting a more generous credit, for example up to 10 hours sailplane time regardless of total flight time achieved.
- 1.6 We are also considering whether to deem TMG flight time to be equivalent to aeroplane flight time when crediting towards the CPL.

Question 6:

Do you support further credit for SPL holders towards licences issued under Part-FCL? Please enter any comments or proposals you wish to make.

Chapter 2

Theoretical knowledge validity

- 2.1 In 2024 we consulted on the following proposals for the PPL ([FCL.025](#)) and Balloon Pilot's Licence ([BFCL.135](#)):
- Extending the validity period of the completed theoretical knowledge requirements from 24 to 36 months;
 - Changing the requirement to complete all exams within 18 months from a fixed period to a 'rolling' arrangement; and
 - Removing the 'four failures' rule that requires applicants to restart the suite of exams if they fail a single subject on more than three occasions.
- 2.2 The feedback received indicated support for the above proposals. However, after further consideration, we believe that a rolling period within which to complete the exams, that counts 18 months into the past from the day of the most recent exam pass, may be overly complex to implement.
- 2.3 A single fixed period of 36 months would be a more straightforward approach. Each exam pass would be valid towards the issue of a PPL or BPL for 36 months, and only those exams that had expired would need to be retaken prior to applying for the licence.

Question 7:

Do you support our proposal of a single period of 36 months for exam validity? Please enter any comments or proposals you wish to make.

- 2.4 Indicative changes to [FCL.025](#):

FCL.025

(...)

(b) Pass standards

(1) A pass in a theoretical knowledge examination paper will be awarded to an applicant achieving at least 75 % of the marks allocated to that paper. No penalty marking shall be applied.

(2) ~~Unless otherwise determined in this Part, a~~ An applicant for a CPL, ATPL or IR has successfully completed the required theoretical knowledge examination requirements for the appropriate pilot licence or rating if he or she has passed all the required theoretical knowledge

examination papers within a period of 18 months counted from the end of the calendar month when the applicant first attempted an examination.

(3) If an applicant for the ATPL theoretical knowledge examination, or for the issue of a commercial pilot licence (CPL), or an instrument rating (IR) has failed to pass one of the theoretical knowledge examination papers within four attempts, or has failed to pass all papers within either six sittings or within the period mentioned in point (b)(2), the applicant shall retake the complete set of theoretical knowledge examination papers in order to obtain the licence.

(4) If an applicant for the issue of a light aircraft pilot licence (LAPL) or a private pilot licence (PPL) has failed to pass one of the theoretical knowledge examination papers within four attempts, ~~they must comply with (5). or has failed to pass all papers within the period mentioned in point (b)(2), retake the complete set of theoretical knowledge examination papers in order to obtain the licence.~~

(5) Before retaking a theoretical knowledge paper that has been failed on more than four attempts the theoretical knowledge examinations, applicants shall undertake further training at a DTO or an ATO. The extent and scope of the training needed shall be determined by the DTO or the ATO, based on the needs of the applicants.

(c) Validity period

(1) The theoretical knowledge examination is valid towards the issue of a licence or rating when:

(i) for the light aircraft pilot licence or private pilot licence, when all examination papers have been passed in the prior 36 months;

(ii) for the commercial pilot licence or instrument rating (IR), for 36 months counted from the day on which the examinations were completed in accordance with (b)(2).

~~(1) The successful completion of the theoretical knowledge examinations will be valid:~~

~~(i) for the issue of a light aircraft pilot licence or a private pilot licence, for a period of 24 months;~~

~~(ii) for the issue of a commercial pilot licence, instrument rating (IR) or en route instrument rating (EIR), for a period of 36 months;~~

~~(iii) the periods in (i) and (ii) shall be counted from the day when the pilot successfully completes the theoretical knowledge examination, in accordance with (b)(2).~~

Chapter 3

Revalidation of single engine ratings

3.1 The changes for revalidation requirements planned for October 2025 will align the single engine piston (SEP), touring motor glider (TMG) and microlight class¹ ratings across the PPL(A), National PPL(A) and Light Aircraft Pilot's Licence (Aeroplanes) licences.

3.2 For the 2026 amendment we are considering:

- Clarification that an appropriate standard of flying must be displayed during the applicable refresher training; and
- Introducing an option for revalidation by experience for pilots of single engine helicopters up to a MTOW of 3,175 kg.

3.3 Indicative proposed amendments to [FCL.740.A](#) (aeroplanes):

FCL.740.A

(...)

(b) Revalidation of single-pilot single-engine class ratings.

(1) Single-engine piston aeroplane class ratings and TMG class ratings. For the revalidation of single-pilot single-engine piston aeroplane class ratings or TMG class ratings, the applicants shall:

- (i) within the 3 months preceding the expiry date of the rating, pass a proficiency check in the relevant class in accordance with Appendix 9 to this Part with an examiner; or
- (ii) within the validity period of the rating, complete 12 hours of flight time in the relevant class, including:
 - 6 hours during the 12 months preceding the expiry date of the rating,
 - 6 hours as PIC,
 - 12 take-offs and 12 landings, and
 - refresher training of at least 1 hour of total flight time **with to the satisfaction of** a flight instructor (FI) or a class rating instructor

¹ The microlight class rating is only applicable to the NPPL(A) and some older PPL(A) licences issued prior to the introduction of the EASA Aircrew Regulation.

(CRI) who shall select those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures.

Applicants shall be exempted from this refresher training if they have passed a class or type rating proficiency check, skill test or assessment of competence in any other class or type of aeroplane.

(2) When applicants hold both a single-engine piston aeroplane-land class rating and a TMG rating, they may complete the requirements of (1) in either class or a combination thereof, and achieve revalidation of both ratings.

(...)

Helicopter requirements

3.4 Indicative changes to [FCL.740.H](#) (helicopters):

FCL.740.H

(a) Revalidation. For the revalidation of type ratings for helicopters, applicants shall comply with one of the following, as applicable:

(1) for type ratings other than mentioned in (2):

(i) within the validity period of the type rating, complete at least 2 hours as pilot in the relevant helicopter type;

(ii) within the 3 months immediately preceding the expiry date of the type rating, pass a proficiency check:

(A) which is conducted in accordance with Appendix 9 in the relevant type of helicopter or an FSTD representing that type;

(B) the duration of which may be counted towards the flight time specified in point (i);

(2) for type ratings for single-engine helicopters up to a maximum take-off mass of 3 175 kg, they shall meet one of the following conditions:

(i) comply with point (a)(1);

(ii) complete, in the relevant type of helicopter, both of the following:

(A) within the validity period of the type rating, at least 6 hours as PIC;

(B) within the 3 months immediately preceding the expiry date of the rating, a refresher training of at least 1 hour of total flight time with and to the satisfaction of an instructor who shall select those flight exercises that allow the applicant to refresh their competence in safely operating the aircraft and applying normal, abnormal and emergency procedures. Applicants may choose to complete the refresher training in the aircraft or an FSTD representing the relevant type, or in a combination of both.

(b) When applicants hold more than one type rating for SEP helicopters, they may achieve revalidation of all the relevant type ratings by passing the proficiency check in accordance with point (a)(1)(ii) or completing the refresher training in accordance with point (a)(2)(ii)(B) in only one of the relevant types held, provided that they have completed either of the following flight times as PIC in each of the other relevant types during the validity period:

(1) if they completed a proficiency check in accordance with point (a)(1)(ii), at least 2 hours;

(2) if they completed a refresher training in accordance with point (a)(2)(ii)(B), at least 6 hours.

The proficiency check or the refresher training, as applicable, shall be performed each time on a different type. The new validity period of all type ratings revalidated in accordance with this point shall commence together with the validity period of the type rating for which the proficiency check or the refresher training is performed.

(c) When applicants hold more than one type rating for SET helicopters with a maximum certified take-off mass up to 3 175 kg, they may achieve revalidation of all the relevant type ratings by passing the proficiency check in accordance with point (a)(1)(ii) or completing the refresher training in accordance with point (a)(2)(ii)(B) in only one of the relevant types held, provided that they have completed all of the following:

(1) 300 hours as PIC on helicopters;

(2) 15 hours on each of the types held;

(3) either of the following flight times as PIC in each of the other relevant types during the validity period:

(i) if they completed a proficiency check in accordance with point (a)(1)(ii), at least 2 hours;

(ii) if they completed a refresher training in accordance with point (a)(2)(ii)(B), at least 6 hours.

The proficiency check shall be performed each time on a different type. The new validity period of all type ratings revalidated in accordance with this point shall commence together with the validity period of the type rating for which the proficiency check or the refresher training is completed.

(d) Applicants who successfully complete a skill test for the issue of an additional type rating or a proficiency check for the renewal of a type rating shall achieve revalidation for the relevant type ratings already held in the common groups, as specified in points (b) and (c).

The new validity period of all type ratings revalidated in accordance with this point shall commence together with the validity period of the type rating for which the skill test or proficiency check is completed.

(e) The revalidation of an IR(H), if held, may be combined with a proficiency check for a type rating.

(f) Applicants who fail to achieve a pass in all sections of a proficiency check before the expiry date of a type rating shall not exercise the privileges of that rating until a pass in the proficiency check has been achieved. In the case of points (b) and (c), applicants shall not exercise their privileges in any of the types.

~~(a) Revalidation. For revalidation of type ratings for helicopters, the applicant shall:~~

~~(1) pass a proficiency check in accordance with Appendix 9 to this Part in the relevant type of helicopter or an FSTD representing that type within the 3 months immediately preceding the expiry date of the rating; and~~

~~(2) complete at least 2 hours as a pilot of the relevant helicopter type within the validity period of the rating. The duration of the proficiency check may be counted towards the 2 hours.~~

~~(3) When applicants hold more than 1 type rating for single engine piston helicopters, they may achieve revalidation of all the relevant type ratings by completing the proficiency check in only 1 of the relevant types held, provided that they have completed at least 2 hours of flight time as PIC on the other types during the validity period. The proficiency check shall be performed each time on a different type.~~

~~(4) When applicants hold more than 1 type rating for single engine turbine helicopters with a maximum certificated take-off mass up to 3175 kg, they may achieve revalidation of all the relevant type ratings by completing the proficiency check in only 1 of the relevant types held, provided that they have completed:~~

~~(i) 300 hours as PIC on helicopters;~~

~~(ii) 15 hours on each of the types held; and~~

~~(iii) at least 2 hours of PIC flight time on each of the other types during the validity period.~~

~~The proficiency check shall be performed each time on a different type.~~

~~(5) A pilot who successfully completes a skill test for the issue of an additional type rating shall achieve revalidation for the relevant type ratings in the common groups, in accordance with (3) and (4).~~

~~(6) The revalidation of an IR(H), if held, may be combined with a proficiency check for a type rating.~~

~~(b) An applicant who fails to achieve a pass in all sections of a proficiency check before the expiry date of a type rating shall not exercise the privileges of that rating until a pass in the proficiency check has been achieved. In the case of (a)(3) and (4), the applicant shall not exercise his/her privileges in any of the types.~~

Revalidation by instructors

3.5 Indicative changes to [FCL.945](#):

FCL.945

(1) Upon satisfactory completion of the training flight for the revalidation of an SEP or TMG class rating in accordance with FCL.740.A (b)(1) or for the revalidation of a single-engine helicopter type rating in accordance with FCL.740.H(a)(2), and only in the event of fulfilment of all the other revalidation criteria required by FCL.740.A (b)(1) or FCL.740.H(a)(2), as applicable, the instructor shall endorse the applicant's licence with the new expiry date of the rating or certificate, if specifically authorised for that purpose by the CAA responsible for the applicant's licence.

Question 8:

Do you support the requirement that an appropriate standard of flying must be displayed during the refresher training? Please enter any comments you wish to make.

Question 9:

Do you support the introduction of an option to revalidate single engine helicopter ratings with a combination of flight experience and refresher training? Please enter any comments you wish to make.

Chapter 4

Balloon regulation

- 4.1 Most of the significant changes to the UK Balloon Regulation will come into force in October 2025.
- 4.2 A small number of areas have been identified by stakeholders as potential amendments to be made in 2026, for which we seek comment.

Balloon pilot restraint requirements

- 4.3 Stakeholder feedback has indicated that [BOP.BAS.320](#) may be disproportionate in terms of pilot restraint system requirements. Currently a restraint is needed when a balloon is fitted with ‘turning vents’ or a separate passenger compartment. We are open identifying a more proportionate solution which upholds an appropriate level of safety.

LPC and OPC requirements

- 4.4 Stakeholder feedback has indicated that the operator proficiency check (OPC) and licence proficiency check (LPC) requirements for commercial (passenger) operations should be clarified in terms how the two requirements are applied in practice. We are open identifying a more proportionate solution which upholds an appropriate level of safety.

BPL theoretical knowledge validity

- 4.5 As described in Chapter 2, whatever changes are made to FCL.025 regarding the validity period of theoretical knowledge examination papers would be mirrored in [BFCL.135](#).

Question 10:

Please enter any comments you may have on the balloon regulation issues described in Chapter 4?

Chapter 5

Instrument rating

Theoretical knowledge

- 5.1 We still intend to review the CB IR theoretical knowledge requirements associated with the instrument rating (IR) gained via the competency based modular (CBM) training route.
- 5.2 This work will likely commence towards the end of 2025 or in early 2026, with a view to potentially consolidating the number of exams and ensuring the learning objectives remain appropriate. As part of the review, we may seek to reduce or remove entirely the amount of mandatory theoretical knowledge instruction that is required.

Question 11:

Do you have any comments on the review of the CB IR theoretical knowledge?

IMC rating validity period

- 5.3 We will progress the change of validity period from 25 months to 24 months, as consulted on in 2024. The 24 months would be counted from the end of the month in which the rating was revalidated or renewed. This aligns with the convention for other ratings that are normally valid for 12 months or multiples of such.

Removal of EIR from regulations

- 5.4 The UK has only issued three Enroute Instrument Ratings since 2014. As consulted on in 2024, we therefore believe it appropriate to remove the EIR from the regulations. Flight time under the privileges of the EIR may be credited towards an Instrument Rating (IR) gained under the CBM training provisions.

Basic Instrument Rating

- 5.5 The Basic Instrument Rating (BIR) was adopted into European regulation in 2020 and has been available within EASA member states since September 2021. It does not comply with the ICAO Annex 1 (Personnel Licensing) requirements for the full instrument rating, so is only valid within European airspace.
- 5.6 The BIR is entirely competency based, with no minimum requirements for flight training. There are three theoretical knowledge exams required for the rating.

- 5.7 The privileges are to fly on non-commercial operations under IFR, with higher take-off and landing minima than the full IR. There are no limitations on the airspace classifications in which the privileges may be exercised.
- 5.8 The UK did not adopt the BIR, since the utility for UK based pilots was judged to be limited – as the UK is no longer an EASA member state, a UK issued BIR would not have been valid outside UK airspace. However, the BIR may offer a proportionate ‘stepping stone’ route to the full IR, with greater flexibility of training requirements.
- 5.9 Under the European BIR regulations, a holder of the rating with 50 hours of flight time as PIC of aeroplanes under IFR may take the IR skill test and demonstrate an appropriate level of theoretical knowledge to the examiner, in lieu of taking the theoretical knowledge exams applicable to the IR.

Question 12:

Would you support the introduction of the Basic Instrument Rating in the UK? Please enter any comments or proposals you wish to make.

Chapter 6

Other issues

Class ratings

- 6.1 In 2024 we consulted on reviewing the class rating system, in addition to the inclusion of electric aircraft that is planned for October 2025.
- 6.2 We note that EASA have recently removed reference to individual types from the single engine turbine (SET) class rating on the European version of the aeroplane [type rating and endorsement list](#).
- 6.3 The removal of type references appears to simplify the requirements when someone is qualified on multiple SET types – the rating may be revalidated on any type within the class, and other SET types may then be flown, subject to having completed appropriate differences training within the prior two years.
- 6.4 Will review the type rating and endorsement list in line with recent changes to the equivalent EASA document.

Question 13:

Would you support revising SET class rating arrangements as per the EASA changes? Please provide any comments or proposals you may have.

'90-day' rule

- 6.5 The '90-day' rule refers to the requirement that to fly with passengers onboard the aircraft, you must have completed in the preceding 90 days at least three take offs and landings in the same type or class of aircraft as for the intended flight.
- 6.6 There is currently a misalignment between the requirements of [FCL.060](#) in Part-FCL and the equivalent provisions in [Schedule 8](#) of the Air Navigation Order 2026 – in some circumstances (known as the 'recent experience exception') the Order allows a pilot who does not comply with the 90-day rule to take a single additional occupant in the aircraft, who must be a pilot qualified on type.
- 6.7 We seek to eliminate differences in requirements between Part-FCL and the Order, so to this end are considering three options:
- Remove the alleviation in the Order and harmonise with the text of FCL.060;
 - Harmonise FCL.060 with the Order; or
 - Remove the 90-day rule requirement for non-commercial operations.

Question 14:

Which option for the 90-day rule do you support? Please add any comments or proposals you wish to make

Microlight instructor supervision

- 6.8 In the October 2025 amendments we are introducing additional flexibility to the requirements for a flight instructor (FI) on gyroplanes supervising an FI (restricted).
- 6.9 The amendments allow the supervising FI to be flying another aircraft while also supervising a restricted FI, provided they remain within the circuit pattern of the aerodrome or within a local flying area used by the training organisation.
- 6.10 We are considering extending the same flexibility to microlight instructors.

Question 15:

Would you agree with applying the flexibility described above to the microlight instructor arrangements? Please enter any comments or proposals you wish to make.

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
BPL	Balloon Pilot Licence
CBIR(A)	Competency-Based modular Instrument Rating (Aeroplanes)
CRD	Comment 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

LPC	Licence Proficiency Check
MEP	Multi-Engine Piston
MET	Multi-Engine Turboprop
NPA	Notice of Proposed Amendment
NPPL	National Private Pilot Licence
OPC	Operator Proficiency Check
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