

# General Aviation Pilot Licensing Review

## ‘Wave 2’ proposals

CAP3212 Consultation Response Document

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# Introduction

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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 came into force in September and October 2025.
2. We conducted a further consultation on additional proposals arising from the review planned for implementation in 2026. This included updates on proposals originally stated in the Spring 2024 consultation.
3. The proposals largely related to UK Regulation (EU) 1178/2011 (“the UK Aircrew Regulation”). A small number of changes were also proposed for UK Regulation (EU) 2018/395 (“the UK Balloon Regulation”).
4. The consultation included proposed draft changes to the text of the regulation for context.
5. The consultation ran from 7<sup>th</sup> July 2025 and closed on 8<sup>th</sup> August 2025. We received 560 responses to the consultation. Most respondents answered the survey questions and a proportion also left supporting comments. We reviewed all responses and comments left.
6. 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

## Next steps

7. The Department for Transport will review our Opinion and Instructions Document (OID) and put forward legislation as appropriate for enactment, currently planned for the summer of 2026.
8. There will be a further consultation next year on associated Acceptable Means of Compliance (AMC), Guidance Material (GM) and other supporting CAA publications relevant to rule changes.
9. 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

## Chapter 1

# Crediting of flight time

## Microlight aeroplanes

1.1 Amendments to the UK Aircrew Regulation that came into force in October 2025 allowed a larger proportion of flight time on three axis microlight aeroplanes to be credited towards the issue of a Private Pilot Licence (PPL)(Aeroplanes).

1.2 We proposed extending the crediting of three axis microlight time towards the experience requirements for the commercial pilot's licence (CPL) gained via the modular course as described in [Appendix 3, section E of Part-FCL](#).

**Question: 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?**

Option	Total	Percent
Yes	399	71.25%
No	47	8.39%
No view/don't know	113	20.18%
Not answered	1	0.18%

## Outcome

1.3 A very high proportion of those respondents that had a view, supported this proposal.

1.4 We believe this proposal will bring a welcome reduction in costs for potential CPL applicants, and will progress with this proposal in our OID to the Department for Transport (DfT).

### **“Wave 2” Consultation Outcome – CAA Decision no.1:**

**We will progress with extending the crediting of three axis microlight time towards the experience requirements for the CPL gained via the modular course.**

## Sailplanes

1.5 Following feedback in the 2024 consultation we were asked to further review the experience credits towards the PPL(A) for pilots with flight time on sailplanes.

1.6 The current route for a Sailplane Pilot Licence(SPL) holder with Touring Motor Glider (TMG) privileges to gain a PPL(A), after completion of a 15-hour PPL course at an Approved Training Organisation (ATO) or Declared Training

Organisation (DTO), ensures a minimum experience of 45 hours on a combination of TMG and aeroplanes.

- 1.7 We proposed reducing the minimum flight time for SPL holders with TMG privileges to 40 hours, in line with amendments to FCL.210.A which came into force in October 2025.
- 1.8 We also proposed deeming TMG flight time to be equivalent to aeroplane flight time when crediting towards the CPL.

**Question: Do you support further credit for SPL holders towards licences issued under Part-FCL?**

Option	Total	Percent
Yes	342	61.07%
No	29	5.18%
No view/don't know	188	33.57%
Not answered	1	0.18%

### Outcome

- 1.9 Of those respondents that had a view, this proposal received overwhelming support (92%)
- 1.10 We will progress with this proposal in our OID to the DfT.

#### **“Wave 2” Consultation Outcome – CAA Decision no.2:**

**We will progress with allowing further credit for SPL holders towards licences issued under Part-FCL.**

## Chapter 2

## Theoretical knowledge validity

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2.1 In 2024 we consulted on the following proposals for the PPL ([FCL.025](#)) and Balloon Pilot Licence (BPL) ([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 believed 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 We proposed a single fixed period of 36 months as 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: Do you support our proposal of a single period of 36 months for exam validity?**

Option	Total	Percent
Yes	461	82.32%
No	29	5.18%
No view/don't know	66	11.79%
Not answered	4	0.71%

### Outcome

2.4 Of those that had a view, a large majority were in support of this proposal.

2.5 We will progress with this proposal in our OID to the DfT.

2.6 Implementation will require funding to amend the online eExam platform, the timeline for which is yet to be confirmed.

#### **“Wave 2” Consultation Outcome – CAA Decision no.3:**

**We will progress with the single period of 36 months for exam validity for the PPL. The timescale is subject to appropriate funding.**

## Chapter 3

## Revalidation of single engine ratings

### Fixed wing

3.1 The changes for revalidation requirements implemented in October 2025 aligned the single engine piston (SEP), TMG and microlight class ratings across the PPL(A), National PPL(A) and Light Aircraft Pilot's Licence (Aeroplanes) licences.

3.2 We proposed changes to clarify that an appropriate standard of flying must be displayed during the applicable refresher training as well as introducing an option for revalidation by experience for pilots of single engine helicopters up to a MTOW of 3,175 kg.

**Question: Do you support the requirement that an appropriate standard of flying must be displayed during the refresher training?**

Option	Total	Percent
Yes	477	85.18%
No	61	10.89%
No view/don't know	19	3.39%
Not answered	3	0.54%

### Key comments

3.3 "Yes, this is also very valuable and a safe approach to pilots maintaining skills"

3.4 "Although I support the principle that an appropriate standard of flying must be displayed, I think the content of the flight should be at the preference of the licence holder e.g. one may wish to practice short field/crosswind landings or stalls. A simple flight from the airfield to point B and return would not meet the requirement."

3.5 "On the basis that the CAA also provide the equivalent of an AMC (Acceptable Means of Compliance) to 'define' an appropriate standard of flying. So as to remove debate between licence holder undergoing the refresher training and the CRI/FI/Examiner."

3.6 "Absolutely. Too many older pilots at my airfield doing reval through experience, with a 'sympathetic' instructor, and the standard is super low."

3.7 "Too often training is mediocre, fails to value airmanship and is a tick-box exercise. It should be robust, fit for purpose, and offer the trainee support and guidance where necessary."

3.8 "It is not a test. It is an instructional hour."

3.9 “But this means a formal standard needs to be set. That is akin to a test so brings into question who will conduct it. FIs are not examiners and CRIs certainly do not have the range of instructing skills required.”

### Outcome

3.10 Of those that had a view, the vast majority supported this proposal.

3.11 It is not the intention to turn the refresher training session into a biennial test, and instructors and pilots will retain discretion as to the exact content of the flight – the key point being is that instructors should observe a standard of flying consummate with the privileges of the rating.

3.12 We will progress with this proposal in our OID to the DfT. We will review further as part of the Acceptable Means of Compliance (AMC)/Guidance Material (GM) consultation later in 2026.

#### “Wave 2” Consultation Outcome – CAA Decision no.4:

**We will progress with the amendments to the refresher training flight to ensure an appropriate standard of flying is displayed.**

### Rotary wing

3.13 We sought feedback on the option of being able to revalidate single engine helicopter ratings with a combination of flight experience and refresher training.

**Question: Do you support the introduction of an option to revalidate single engine helicopter ratings with a combination of flight experience and refresher training?**

Option	Total	Percent
Yes	177	31.61%
No	9	1.61%
No view/don't know	372	66.43%
Not answered	2	0.36%

### Outcome

3.14 Of those who had a view, a large proportion (95%) agreed with this proposal.

3.15 On further analysis, we believe more time is required to develop appropriate guidance that would mitigate any loss in flight standards resulting from not having annual proficiency checks for helicopter pilots. We will not implement this in 2026 but will conduct a further review in the future.

#### “Wave 2” Consultation Outcome – CAA Decision no.5:

**We will not be progressing with the introduction of an option to revalidate single engine helicopter ratings with a combination of flight experience and refresher training at this time.**

## Chapter 4

# Balloon regulation

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4.1 We sought feedback on the below three subjects:

### **Balloon pilot restraint requirements**

4.2 Stakeholder feedback has indicated that the requirements of [BOP.BAS.320](#) may be disproportionate regarding the circumstances in which a pilot restraint system is required. We are open to modifying the requirements as appropriate.

### **Proficiency check requirements**

4.3 Stakeholder feedback has indicated that the operator proficiency check (OPC) and licence proficiency check (LPC) requirements for commercial (passenger) operations should potentially be revised. We are open to modifying the requirements as appropriate.

### **BPL theoretical knowledge validity**

4.4 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](#).

### **Key comments**

4.5 "The requirement for a restraint in balloons with turning vents should be removed."

4.6 "For category A (less than 120) pilot restraints should not be imposed. For category B (above 120) I think that pilot restraints have a safety value simply because of the number of potential passengers, but irrespective of whether the envelope has turning vents or not (although many do)."

4.7 "The mandate for a pilot restraint where rotation vents are fitted in a single compartment basket should be removed. It is not at all clear that safety is enhanced in this configuration, where passenger entanglement in the "tail" of the pilot restraint is likely. It was a drafting error at EASA to leave "OR" rather than "AND". We should require the presence of both compartmentalised basket AND presence of rotation vents to trigger a requirement for a pilot restraint."

4.8 "There is no justification for any Operator Proficiency Checking for commercial non-CPB. there is no Licensing Proficiency Check for pilots who conduct (only) commercial non-CPB, so references to any flying element of Operator Proficiency Check for commercial non-CPB should be removed."

**4.9 “Commercial non-CPB.**

There is no LPC mandated for Commercial non-CPB in Part BFCL. Reference in Part BOP to an OPC for this activity is inappropriate, brings non-CPB into the remit of DBOs and is presently ignored by CAA. This requirement should simply be removed.

**CPB**

Presently, the OPC mandate in Part BOP could lead to multiple check flights being required by pilots flying for different DBOs. A pragmatic solution, maintaining safety standards, is to make the 24 monthly LPC the only flight check required for CPB. The OPC would become a ground-based exercise, focussed on operator-specific topics. Requirements to be captured in a revised BOP.ADD.315 and associated AMC.

It would remain possible for a DBO to require an additional flight check if deemed appropriate.”

**Outcomes****4.10 We will progress the below proposals in our OID to the DfT.****“Wave 2” Consultation Outcome – CAA Decision no.6:**

**We will progress minor changes to the balloon pilot restraint requirements, making them more flexible for general operations, but ensuring they are always fitted and used for commercial passenger operations.**

**“Wave 2” Consultation Outcome – CAA Decision no.7:**

**We will progress with removing the requirement for an operator proficiency check for commercial non-passenger operations.**

**“Wave 2” Consultation Outcome – CAA Decision no.8:**

**We will progress with removing the requirements for carrying a fire extinguisher, first aid kit and fire blanket for balloons that do not have a basket.**

**“Wave 2” Consultation Outcome – CAA Decision no.9:**

**We will progress the proposed changes to the BPL theoretical knowledge validity BFCL.135, as aligned with those proposed for FCL.025.**

## Chapter 5

## Instrument rating

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### Competency Based Instrument Rating

5.1 We sought feedback on the potential to consolidate the number of exams for the Competency Based Instrument Rating (CBIR) training route, as well as reviewing the requirement for a mandatory amount of theoretical knowledge instruction.

#### Key comments

5.2 “It would be very good to consolidate the number of exams and make the syllabus more relevant to GA operations. Everybody learns differently so there should be no mandatory theoretical training as the examinations determine the level of acquired knowledge.”

5.3 “Some theoretical knowledge is important, although that could be ascertained by the instructor rather than it being mandatory to teach it.”

5.4 “The CBIR is much too complicated at the moment. Making it easier to obtain for GA pilots will make everyone safer.”

5.5 “Can it be based on GA rather than for those going on to fly heavy commercial aircraft, such as 737, 777, 787 etc. Surely, they could be a CB IR rating for SEP or light twin pilots who want the added advantage of safety and to be equipped with knowledge and qualifications to fly safe IR approaches and IFR when necessary.”

#### Outcome

5.6 Almost all comments were in support of examining this issue further. We intend to conduct a review of the CBIR question bank and potentially consolidate the existing subjects into a smaller number of exams.

5.7 We will progress the below proposal in our OID to the DfT.

#### “Wave 2” Consultation Outcome – CAA Decision no.10:

**We will progress with removing the mandatory amount of classroom training, whilst retaining the requirement for an appropriate level of training to ensure the candidate can pass the theoretical knowledge exams.**

### Basic Instrument Rating

5.8 We proposed introducing the Basic Instrument Rating (BIR) into UK regulation. It has been available within EASA member states since 2021.

**Question: Would you support the introduction of the Basic Instrument Rating in the UK?**

Option	Total	Percent
Yes	461	82.32%
No	42	7.50%
No view/don't know	54	9.64%
Not answered	3	0.54%

**Outcome**

5.9 A large proportion of those who had a view were in favour of this proposal.

5.10 On reflection and bearing in mind the review of the CBIR theory requirements, we feel it more appropriate to focus on these reforms before introducing an alternative to the traditional instrument rating. We will therefore not proceed with introducing the BIR to the UK at this time, and will instead concentrate on making the CBIR more proportionate for GA pilots.

**“Wave 2” Consultation Outcome – CAA Decision no.11:**

**We will not implement the BIR at this time. We will instead prioritise our review of the CBIR and making it more proportionate.**

## Chapter 6

# Other issues

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### Class ratings

6.1 We sought feedback on whether we should revise the SET class rating arrangements in line with changes that EASA have implemented

**Question: Would you support revising SET class rating arrangements as per the EASA changes?**

Option	Total	Percent
Yes	235	41.96%
No	14	2.50%
No view/don't know	306	54.64%
Not answered	5	0.89%

### Outcome

6.2 Of the respondents who had an opinion, the vast majority agreed with this proposal.

6.3 We will be further reviewing this proposal as part of the AMC/GM consultation later in 2026

**“Wave 2” Consultation Outcome – CAA Decision no.12:**

**We will review further in the AMC/GM consultation later in 2026.**

### ‘90-day’ rule

6.4 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 2016 – 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.

6.5 We sought 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: Which option for the 90-day rule do you support?**

Option	Total	Percent
Remove the alleviation in the Order and harmonise with the text of FCL.060;	86	24.86%
Harmonise FCL.060 with the Order;	148	42.77%
Remove the 90-day rule requirement for non-commercial operations.	63	18.21%
Neither	49	14.16%

**Outcome**

6.6 The majority of those who had a view opted for the option of aligning FCL.060 with the Order.

6.7 A small number of respondents commented on removing the 90-day rule all together. We do not feel this would contribute to safety in a positive way.

6.8 We will therefore seek to align FCL.060 with the requirements in the Order in our OID to the DfT.

**“Wave 2” Consultation Outcome – CAA Decision no.13:**

**We will seek to align FCL.060 with the requirements in the Order.**

**Microlight instructor supervision**

6.9 In the October 2025 amendments we introduced additional flexibility to the requirements for a flight instructor (FI) on gyroplanes supervising an FI (restricted).

6.10 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.

6.11 We sought feedback on extending the same flexibility to microlight instructors.

**Question: Would you agree with applying the flexibility described above to the microlight instructor arrangements?**

Option	Total	Percent
Yes	290	51.79%
No	18	3.21%
No view/don't know	244	43.57%
Not answered	8	1.43%

**Outcome**

6.12 Of those respondents who had a view, the vast majority (94%) agreed with this proposal.

6.13 We will progress with this proposal in our OID to the DfT.

**“Wave 2” Consultation Outcome – CAA Decision no.14:**

**We will progress with amending the Order to allow more flexibility to the requirements for a flight instructor (FI) on microlights supervising and FI (restricted).**

## ANNEX A

## Abbreviations

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AMC	Acceptable Means of Compliance
ATO	Approved Training Organisation
BIR	Basic Instrument Rating
BPL	Balloon Pilot Licence
CBIR	Competency-Based modular Instrument Rating
CRD	Comment Response Document
DfT	Department for Transport
DTO	Declared Training Organisation
EASA	European Union Aviation Safety Agency
FCL	Flight Crew Licensing
GA	General Aviation
GM	Guidance Material
ICAO	International Civil Aviation Organisation
IFR	Instrument Flight Rules
LPC	Licence Proficiency Check
OPC	Operator Proficiency Check
OID	Opinion and Instruction Document
PPL	Private Pilot Licence
SARPs	Standards & Recommended Practices (ICAO Annexes)
SEP	Single-Engine Piston
SET	Single-Engine Turboprop
SPL	Sailplane Pilot Licence
TMG	Touring Motor Glider