

# Pilot Medical Declaration Consultation Response Document

CAP 3249

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# Introduction

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1. We ran a [consultation](#) (CAP 3218) earlier in the year regarding potential amendments to the Pilot Medical Declaration (PMD) regulations in the Air Navigation Order 2016 (ANO) and UK Regulation (EU) No 1178/2011 (the Aircrew Regulation) .
2. The proposals principally concerned the provision of flight training where the instructor exercises their privileges on the basis of making a PMD.
3. Amendments to [MED.A.030](#) in 2021, as a result of EU exit, alongside the republished exemption, [ORS4 1629](#), in September 2025, created inconsistencies in the privileges associated with making a PMD between pilot licences issued under the ANO and those issued under the UK Aircrew Regulation. The inconsistencies were particularly regarding the privileges of the Flight Instructor (FI) or Class Rating Instructor (CRI) certificates. We therefore proposed to bring more parity between the two regulations.
4. We previously reviewed the PMD requirements and consulted on proposed changes in 2023. The associated consultation response document (CRD), [CAP 3059](#), was published in November 2024. The conclusions have yet to be implemented due to delays with developing a suitable IT system to support them. This more recent consultation does not supersede the earlier CRD, but will establish more consistency in the regulations, pending full adoption of the 2024 conclusions in the future.
5. The consultation included proposed draft changes to the text of the regulation for context. Any draft changes included in the consultation are the CAA's recommendations to the Department for Transport (DfT). The final wording will be drafted by the DfT and then laid before Parliament for acceptance.
6. The consultation ran from 5<sup>th</sup> February 2026 and closed on 9<sup>th</sup> March 2026. We received 622 responses to the consultation. Most respondents provided comments on both proposed amendments to the Order and the Aircrew Regulation. We reviewed all comments left by respondents.
7. The results of this consultation and the next steps are detailed below.

## Chapter 1

## Proposed amendments

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- 1.1 This chapter provides a summary of the proposed changes. Refer to the original [consultation document](#) for full details.
- 1.2 Article 163 of the Air Navigation Order (ANO) would describe the privileges of an FI or CRI issued under the ANO when supported only by a PMD, and in some instances make the privileges more limited than currently the case. It was also proposed to allow, under Part-MED of the UK Aircrew Regulation, some instruction by holders of Part-FCL FI or CRI certificates, which is currently not permitted.
- 1.3 We proposed that FI or CRI certificate holders with a PMD may provide instruction towards:
- The NPPL(A) and associated class ratings;
  - Revalidation and renewal of existing class ratings; and
  - Differences training associated with an existing rating.
- 1.4 We also proposed to introduce a distinction between the medical requirements when flying aircraft up to 2,000 kg MTOM and those between 2,001 kg and 5,700 kg, reflecting the effect of the [ORS4 No. 1629](#) exemption, which has been in effect now for four years. Incorporating the different medical criteria based on the MTOM of the aircraft would allow for the removal of the exemption, improving clarity for stakeholders.
- Incorporating the ORS4 1629 exemption into Part-MED would also provide for student pilots training towards a BPL or SPL doing so on a PMD.
- 1.5 There were no changes in relation to the PMD proposed to the privileges of the FI (microlight), FI (gyroplanes), FI (TMG), FI (Balloons), FI (Sailplanes), or examiners associated with those aircraft categories.

### Common themes and CAA responses

- 1.6 We received a number of comments regarding the wording in Article 163 (6) (g), “such other medical conditions as the CAA may specify”, being too vague and allowing the CAA to make changes without consultation.

**CAA Response:** This wording in Article 163 (6) (g), has been in the ANO since the PMD was introduced in 2016. This is always exercised proportionately by the CAA and only when required to address specific concerns around aviation safety that are not covered by the driving licence medical standard. The additional

medical conditions are published on the medical guidance pages of the CAA website.

- 1.7 Another common theme raised was the inconsistency between the ANO and the Aircrew regulation. This can cause confusion by having two sets of parallel regulations.

**CAA Response:** We appreciate that having two parallel regulatory systems does cause complexity for stakeholders – this is primarily a legacy of European Union (EU) membership and the way former EU regulation was assimilated into UK law. We are currently working with the Department for Transport on options to align and streamline the parallel systems, as part of wider Government work on reviewing former EU regulation.

- 1.8 Many respondents felt that by allowing instructing towards the NPPL utilising a PMD on a risk basis should also allow instructing towards the PPL, since the risk exposure to the student is the same.

**CAA Response:** Whilst we accept that NPPL and PPL training often take place in similar aircraft and circumstances, the greater volume of PPL training compared to the NPPL does give the activity a different risk profile, and currently we do not believe there is enough data to support wider instructor privileges on the PMD. On average there are around 220 NPPLs issued per year versus around 1300 PPLs.

- 1.9 A large number of respondents wished to continue to be allowed to instruct whilst utilising a PMD on sailplanes and towards the NPPL(A). They felt the PMD was proportionate, low cost and effective for the sub 2000 kg category.

**CAA Response:** Instructors are currently only able to utilise the PMD for instructing towards ANO licences if they hold an instructor certificate issued under the ANO. Allowing Part-FCL instructors to teach the NPPL(A) on a PMD will bring parity between the Aircrew Regulation and ANO.

Instructor certificates issued under Part-BFCL and Part-SFCL will also continue to be able to utilise the PMD.

- 1.10 Many respondents felt that requiring a Class 2 medical for instructors incurs high costs to the community due to the time and complexity of having to evidence and meet the relevant standard. Recent changes to ECG requirements and QRISK<sup>1</sup> assessment as well as a shortage of Aeromedical Examiners (AME) will impact this.

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<sup>1</sup> QRISK is a UK-developed, NICE-approved algorithm used by health professionals to estimate an individual's percentage likelihood of having a heart attack or stroke in the next 10 years. The higher the score, the greater the risk.

They felt that this would in time lead to a loss of experienced older instructors and burden the GA community. They also felt it was excessively expensive and disproportionately affecting older instructors.

**CAA Response:** Instructor certificates issued under Part-FCL will continue to be required to hold a Class 2 medical in order to remain in compliance with ICAO Annex 1, as is the current requirement. The number of Part-FCL instructors that have requested ANO privileges is very low. Our proposed changes will allow Part-FCL instructors to utilise a PMD rather than a Class 2 medical when instructing towards the NPPL and associated ratings, conducting differences training and the renewal/revalidation of existing ratings.

- 1.11 A smaller number of respondents raised concerns over the integrity of the PMD system and the potential misuse. They felt that some pilots self-declare incorrectly or dishonestly. They also felt that the PMD allows pilots to fly with unmanaged or unidentified medical issues.

They felt that a GP sign off for instructors utilising the PMD was a safer option than the restrictions we had proposed.

**CAA Response:** The PMD project is currently on hold. We are still intending to submit the proposed changes to the DfT, as and when we have an IT system capable of supporting this. These proposed changes will increase the reliability of the PMD and offer some protection against pilots misusing the system. Further information can be found in [CAP3059](#).

- 1.12 A small number of respondents felt that a Class 2 should be required for all instructing and examining. They did not feel that the PMD was sufficient.

They also felt that a Class 2 medical was appropriate for pre-solo students.

**CAA Response:** We don't believe that a Class 2 should be required in all instances. We therefore believe that the proposed changes are more proportionate.

## Chapter 2

## Next steps

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- 2.1 We would like to thank all respondents for taking the time to provide feedback.
- 2.2 A number of stakeholders identified possible improvements to the draft changes. We thank them for identifying these and have taken them on board.
- 2.3 We believe the stricter requirements for instructing on PPL versus NPPL are proportionate when considering the number of licences issued per year.
- 2.4 The changes being proposed will bring clarity and consistency to the restrictions of the PMD. Removing the current exemption and regularising it into regulation will provide clearer guidance for pilots and instructors.
- 2.5 After considering all feedback received, the CAA will submit the proposed changes to the DfT for consideration as per Chapter 1.
- 2.6 The DfT will review our Opinion and Instructions Document (OID) and put forward legislation as appropriate for enactment, currently planned for Q4 2026.
- 2.7 There will also be a process to ensure that our internal instructions documents and all staff are ready for the implementation of these changes.

## Chapter 3

# Abbreviations

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AME	Aeromedical Examiner
ANO	Air Navigation Order
CAA	Civil Aviation Authority
CRD	Consultation Response Document
CRI	Class Rating Instructor
DfT	Department for Transport
FI	Flight Instructor
GA	General Aviation
GP	General Practitioner
ICAO	International Civil Aviation Organisation
MTOM	Maximum Take Off Mass
NPPL	National Private Pilot's Licence
OID	Opinion and Instruction Document
PMD	Pilot Medical Declaration
PPL	Private Pilot's Licence
TMG	Touring Motor Glider