

Consultation Reply Document:

Legislation for new types of Vertical Take-Off and Landing (VTOL) aircraft

Part D: Personnel Licensing

CAP3318D

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PART D

Personnel Licensing

Summary

In our consultation (CAP3267), we set out our proposals to amend the Aircrew Regulation (UK Regulation (EU) No 1178/2011) to enable innovation and the integration of new VTOL aircraft, using the principles of the powered-lift category. We explained that these proposals build on the feedback received during the initial consultation (CAP 3186), which confirmed broad support for the application of the existing licensing framework with appropriate amendments to deliver a licensing pathway for the operation and integration of new VTOL into the UK aviation sector. We noted that the proposals largely relate to the Aircrew Regulation, with a small number of changes proposed for the Air Navigation Order 2016 where relevant or necessary.

Consultation responses favoured a flexible, internationally harmonised approach. Responses supported recognition of existing pilot competencies for Instrument Rating (IR) supported by powered-lift type ratings. A recurring theme was aircraft-specific training, checking and experience requirements driven by Operational Suitability Data (OSD) rather than prescriptive regulations. The most significant concern related to mandatory cross-category flight-hour prerequisites, which was considered overly restrictive, irrelevant to some aircraft designs, and a possible source of negative transfer of skills.

Following consideration of consultation feedback received, the CAA intends to proceed broadly as proposed with the exception of an amended approach to the prescribed experience requirements and pre-requisites for the issue of type ratings for powered-lift. The CAA proposes to remove prescriptive cross-category flight-hour prerequisites in FCL.720.PL and introduce operationally dependent IR and MCC requirements. We recognise fixed aeroplane and helicopter experience requirements may not be suitable for the diverse range of emerging powered-lift designs. Aircraft-specific experience requirements and prerequisites for an initial powered-lift type rating will be determined through Operational Suitability Data (OSD). This approach is intended to provide greater flexibility, support innovation and ensure training requirements remain proportionate to individual aircraft characteristics, allowing for future standardised prerequisites if common powered-lift designs emerge.

Aircrew Regulation

Subpart A - General Requirements: FCL.010 Definitions (Question 1)

Consultation proposal: We set out our proposal to amend the definitions in FCL.010 to update the existing UK definition of 'powered-lift aircraft' to capture new types of VTOL aircraft and to align with the ICAO definition from Annex 1.

We proposed replacing the current definition with a new definition of powered-lift as "a heavier-than-air aircraft capable of vertical take-off, vertical landing, and low-speed flight, which depends principally on engine-driven lift devices or engine thrust for the lift during these flight regimes, and on non-rotating aerofoil(s) for lift during horizontal flight."

We invited feedback on the proposed approach and on all associated definitions that may be affected by innovation.

We asked: Do you agree or disagree with the proposed changes to FCL.010 Definitions with reference to personnel licensing of new VTOL aircraft?

Summary of responses: We received 12 responses to this question. Of these, 9 respondents strongly agreed and 2 respondents somewhat agreed. No respondents neither agreed nor disagreed, and no respondents somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Clear definitions for powered-lift and new VTOL aircraft are a necessary first step in establishing an effective personnel licensing framework.
- The proposals provide regulatory clarity, consistency, and legal certainty.
- Use of internationally recognised terminology supports harmonisation with overseas regulatory frameworks.
- The changes provide an appropriate foundation for developing future type rating, training, and operational requirements.
- Multiple responses considered the changes an essential enabler for the introduction of VTOL operations in the UK and supported adoption of the proposed definitions.

Comments opposing the proposals highlighted the following reasons:

- One response strongly disagreed with the proposed change to definitions. The response did not identify specific concerns regarding definitions. In order not to duplicate responses, we have summarised these comments once under question 2.

Other comments raised include:

- The licensing framework should remain flexible enough to accommodate future powered-lift technology and aircraft designs.
- Frameworks should support proportionate licensing pathways for larger commercial eVTOL and smaller non-commercial aircraft.
- The CAA should recognise that different aviation authorities may classify the same aircraft differently and support international harmonisation where possible.

CAA view: We propose to amend FCL.010 definitions in the Aircrew Regulation to the extent necessary for the integration of new types of VTOL aircraft. The powered-lift

definition will be amended as proposed, to align with the current ICAO powered-lift definition. 'Multicopter' will replace the previously proposed 'Non-Conventional Helicopter' term. Detailed rationale for 'Changes to VTOL Definitions – Multicopter' is set out in Part A of this response document. We do not propose to add Multicopter as a new definition within the Aircrew Regulation. As a sub-category of helicopter, licensing pathways for helicopters supported in flight chiefly by the reactions of the air with more than two power driven rotors on substantially vertical axis will be captured by the existing definition of Helicopter.

Subpart C - Private Pilot Licence (PPL) (Questions 2 & 3)

Consultation proposal: We set out our proposal to enable a new pathway for existing Private Pilot Licence (PPL) holders to pursue both powered-lift and multicopter (previously termed non-conventional helicopter) type ratings for non-commercial purposes. We explained that we do not propose an ab initio flight training pathway for new powered-lift aircraft in this consultation, and that further consideration will be given to an ab initio pathway in the future.

We proposed amendments to FCL.205.A PPL(A) - Privileges and FCL.205.H PPL(H) - Privileges to the extent necessary to enable PPL licence holders to exercise privileges on powered-lift aircraft. We explained that powered-lift is a recognised category within ICAO Annex 1, and that a powered-lift type rating can be endorsed on another category of licence. We set out that these amendments would recognise the privileges of the powered-lift type rating within the scope of privileges held for an aeroplane or helicopter category.

We asked: Do you agree with the proposed changes to FCL.205A PPL(A) and FCL.205H PPL(H) — Privileges?

Summary of responses: We received 10 responses to this question. Of these, 9 respondents agreed and one respondent disagreed.

Comments in support of the proposals highlighted the following reasons:

- The proposals provide a practical, and proportionate means of integrating powered-lift aircraft into the existing pilot licensing framework.
- Allowing PPL holders to obtain powered-lift privileges through type-rating training avoids the need to create a separate licensing structure reducing unnecessary regulatory complexity.
- The requirement for type-rating training was seen as providing an appropriate level of safety while recognising existing pilot competence.
- The approach supports innovation, and the introduction of new VTOL aircraft without compromising safety oversight.

- Responses observed that many early powered-lift pilots are likely to come from existing aeroplane and helicopter pilot populations, making transition pathways logical and efficient.
- Some responses considered the proposals particularly beneficial for light powered-lift aircraft used for recreational flying, personal ownership and flight training, where creating a wholly separate licensing system could create unnecessary barriers.

Comments opposing the proposals highlighted the following reasons:

- The one respondent who strongly disagreed with the proposal raised a concern that the approach departs from current licensing principles that require separate licensing pathways for aeroplanes and helicopters.
- The proposals would permit pilots to transition from aeroplane or helicopter licences to powered-lift aircraft even though powered-lift aircraft may combine characteristics of both categories and could be more complex to operate.
- The response questioned the safety rationale for permitting such transitions when equivalent cross-category privileges are not available between aeroplane and helicopter licences.
- Existing aeroplane and helicopter theoretical knowledge syllabi do not adequately address powered-lift operations.
- The respondent advocated the introduction of dedicated ab initio powered-lift licences, such as PPL(VTOL) and CPL(VTOL), rather than adapting existing aeroplane licensing privileges.

Other comments raised include:

- Future training, licensing and rating requirements should remain proportionate to the size, complexity, intended use/operational characteristics of the aircraft.
- Licensing requirements for smaller recreational or training powered-lift aircraft should not necessarily mirror those developed for larger commercial passenger-carrying VTOL aircraft.
- As the powered-lift sector develops and training infrastructure matures, consideration should be given to introducing dedicated ab initio powered-lift training and licensing pathways.
- One response noted that the FAA has adopted a similar transition-based approach, it has also enabled future ab initio pathways and has not ruled out the eventual introduction of dedicated licensing routes.

CAA view: We propose to introduce amendments necessary to enable PPL licence holders to exercise powered-lift type rating privileges in accordance with FCL.720.PL The CAA acknowledges the feedback that powered-lift aircraft should have their own dedicated license structure from the outset, reflecting their distinct operating characteristics. This feedback relates to matters that were considered in the context of the

CAA approach proposed and responded to during the initial consultation (CAP 3186). The CAA has already published its assessment and rationale in response to those comments. In the absence of substantive new evidence or information the CAA position remains unchanged.

Subpart D - Commercial Pilot Licence (CPL) and Subpart F – Airline Transport Pilot Licence (ATPL) (Question 4 and 5)

Consultation proposal: We set out our proposal to amend Subpart D, Subpart F and associated provisions to the extent necessary to enable CPL and ATPL licence holders to exercise privileges on powered-lift aircraft. We explained that, consistent with the approach taken for the PPL, these amendments would recognise the privileges of the powered-lift type rating within the scope of privileges held for an aeroplane or helicopter category, reflecting powered-lift as a recognised category within ICAO Annex 1.

We asked: Do you agree with the proposed changes to FCL.305 CPL and FCL.505 ATPL — Privileges and associated provisions?

Summary of responses: We received 12 responses to this question. Of these, 9 agreed, 2 respondents neither agreed nor disagreed, and one respondent disagreed.

Comments in support of the proposals highlighted the following reasons:

- Extending CPL and ATPL privileges to powered-lift was viewed as a logical and proportionate approach, provided pilots hold the relevant powered-lift type rating and complete the required training, checking and operational requirements.
- The existing CPL/ATPL framework provides an appropriate level of professional competence, command experience and safety assurance for powered-lift aircraft used in commercial passenger operations.
- Bringing powered-lift aircraft within the CPL/ATPL framework would align their treatment with the established licensing structure for complex commercial aviation.

Comments opposing the proposals highlighted the following reasons:

- One response strongly disagreed. In order not to duplicate responses, we have summarised these comments once under question 2.

Other comments raised include:

- Industry feedback proposed amendments should clarify that, for powered-lift aircraft, CPL/ATPL privileges would be exercised on the basis of the appropriate powered-lift type rating endorsed on another category of licence.

CAA view: We will amend the Aircrew Regulation to the extent necessary to enable holders of a Commercial Pilot Licence (CPL) and Airline Transport Pilot Licence (ATPL) to exercise the privileges of a powered-lift type rating in accordance with FCL.720.PL.

We consider that extending CPL and ATPL privileges to powered-lift aircraft is consistent with the existing licensing framework and provides an appropriate basis for commercial powered-lift operations. The existing professional pilot licensing structure is well established and delivers a recognised level of knowledge, competence and operational experience appropriate to commercial operations.

We agree that the regulatory framework should clearly reflect how powered-lift privileges are exercised. Accordingly, the amendments will provide that CPL and ATPL holders may exercise powered-lift privileges where they hold the appropriate powered-lift type rating and satisfy any associated training, checking and operational requirements applicable to the aircraft and operation concerned.

This approach supports the integration of powered-lift aircraft into the existing flight crew licensing framework while maintaining consistency across aircraft categories and ensuring an appropriate level of safety oversight.

Subpart G - Instrument Rating (IR) (Question 6)

Consultation proposal: We set out our proposal to amend Subpart G and associated provisions, in particular FCL.600 IR - General and FCL.610 IR - Prerequisites and crediting, to the extent necessary to enable licence holders to exercise existing IR privileges on powered-lift aircraft where a type rating has been endorsed on the licence in accordance with FCL.720.PL. We also proposed to recognise hours flown as pilot-in-command (PIC) in powered-lift aircraft in the case of IR applications. We explained that the proposed changes would facilitate an IR rating endorsed on the category of licence held to be used on the powered-lift category, and would enable the cross-crediting of flight hours on the powered-lift category and the introduction of a powered-lift IR. We also noted our intention to correct an error in reference to FCL.825.

We asked: Do you agree or disagree with the proposed changes to FCL.600 IR — General and FCL.610 IR — Prerequisites and crediting?

Summary of responses: We received 11 responses to this question. Of these, 8 respondents strongly agreed and 2 respondents somewhat agreed. No respondents neither agreed nor disagreed, and no respondents somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Extending the existing instrument rating framework to powered-lift was viewed as a logical, and proportionate means of supporting powered-lift operations under Instrument Flight Rules (IFR) that enables powered-lift operations to integrate into the wider aviation system.
- A clear pathway to instrument privileges will be important for powered-lift aircraft intending to conduct operations under IFR.
- Established instrument training, qualification and competency requirements provide an appropriate basis for ensuring that powered-lift pilots possess the necessary safety-related competencies.
- Incorporating powered-lift aircraft into the wider instrument rating framework would avoid unnecessary regulatory complexity, duplication and the creation of a separate instrument qualification.
- Existing instrument competencies acquired through an IR(A) or IR(H) should be appropriately recognised and credited because many of the underlying instrument-flying skills are common across aircraft categories.
- Allowing the instrument rating endorsed on the existing category of licence to be used for powered-lift aircraft would provide a practical route for suitably qualified aeroplane and helicopter pilots to transition into powered-lift operations.
- Permitting powered-lift flight time to count towards instrument rating prerequisites was regarded as appropriate and supportive of integration into the wider licensing framework.
- Appropriate cross-crediting would recognise pilots' existing qualifications and experience while maintaining safety through relevant training, checking and type-rating requirements.
- Aircraft-specific instrument procedures, automation, flight-control characteristics, transition-related considerations and abnormal procedures could be addressed through the powered-lift type-rating course and the applicable Operational Suitability Data.

Comments opposing the proposals highlighted the following reasons:

- One responded strongly disagreed. In order not to duplicate responses, we have summarised these comments once under question 2.

Other comments raised include:

- Instrument rating requirements should be linked to the aircraft's intended operation. They should not be imposed unnecessarily on powered-lift aircraft operated exclusively under VFR.
- The drafting should clarify whether the instrument rating appropriate to the category of licence held would be used for powered-lift operations through the relevant powered-lift type rating.

- One response proposed expressly providing that IFR operations in powered-lift aircraft require an instrument rating appropriate to the powered-lift type rating, where an instrument rating appropriate to a separate powered-lift category is not available.
- It was proposed that cross-country flight time as pilot-in-command in powered-lift aircraft should count towards the 50-hour experience prerequisite in FCL.610.
- The drafting should make clear how much of the prerequisite experience must be completed in the relevant aircraft category.

CAA view: We propose to amend Subpart G and associated IR provisions, supporting safe integration and equivalence for powered-lift within the existing instrument rating framework. This approach will recognise common instrument competencies and appropriate crediting of instrument hours to enable licence holders to exercise IR privileges on powered-lift aircraft where a powered-lift/IR type rating has been endorsed on the licence in accordance with FCL.720.PL. We expect powered-lift-specific procedures, systems and handling characteristics to be addressed through type-rating training and Operational Suitability Data.

Subpart H - Class and Type Ratings

Consultation proposal: We set out the approach to new type rating training courses, explaining that these are subject to the training standards determined in the Operational Suitability Data (OSD), aligning with the current approach to type rating training. We explained that the Certification Specifications for Operational Suitability Data - Flight Crew Data (CS-FCD) enables the determination of specific type rating requirements for new aircraft types, providing a standardised data-driven process to ensure pilots receive the appropriate training for a particular aircraft type.

Section 2 - Zero Flight Time Type Rating (ZFTT) - Aeroplanes (Question 7)

We set out that we do not propose amendments to FCL.730.A, which sets out the requirements for zero flight time type rating courses. We explained that these requirements are based on large transport aircraft (CS-25 or equivalent) with a mature certification framework, and that the new VTOL aircraft use case aligns with urban or regional air mobility with small passenger loads. We noted that a standardised design approach for new VTOL aircraft has not yet been established, similarities in handling characteristics are not yet confirmed, and performance is still evolving. We invited submissions on change proposals supported by datasets for future consideration.

We asked: Do you agree or disagree with the proposed approach to FCL.730A Specific requirements for pilots undertaking a zero flight time type rating (ZFTT) course — aeroplanes?

Summary of responses: We received 10 responses to this question. Of these, 4 respondents strongly agreed and 2 respondents somewhat agreed. 2 respondents neither agreed nor disagreed, and one respondent somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- It would be premature to extend zero flight time training arrangements to powered-lift aircraft while operational experience and supporting safety data remain limited.
- Powered-lift aircraft may involve novel flight-control systems, complex transition phases and handling characteristics that differ substantially from those of conventional aeroplanes.
- Requiring pilots to obtain experience in the aircraft, in addition to undertaking simulator training, was considered a prudent and safety-focused approach during the initial introduction of powered-lift operations.
- The proposed approach would be consistent with the approach taken by the FAA, under which relevant tasks must be performed in the aircraft and pilots must obtain in-aircraft experience before conducting passenger-carrying operations in a new aircraft category.
- ZFTT or advanced simulator-based training may ultimately be suitable for larger and more complex powered-lift aircraft, particularly those intended for commercial passenger operations.
- Any ZFTT arrangements should be supported by robust simulator fidelity, appropriate qualification standards and competency-based assessment.

Comments opposing the proposals highlighted the following reasons:

- The regulatory framework should not unintentionally prevent the future introduction of ZFTT for powered-lift aircraft where evidence demonstrates that an equivalent level of safety can be achieved.
- Future training policy should recognise the potential of high-fidelity simulation, advanced training devices and competency-based training methodologies.
- The acceptability of future ZFTT arrangements should be assessed by reference to demonstrated pilot competence and safety outcomes rather than relying solely on traditional training models developed for conventional aircraft categories.
- One respondent strongly disagreed. In order to not duplicate we have listed these comments once under question 2.

Other comments raised include:

- ZFTT is primarily relevant to transport-category aircraft and commercial operations. It may have limited relevance to light powered-lift aircraft used for personal ownership, recreational flying or flight training.
- The framework should remain sufficiently flexible to permit the future introduction of zero-flight-time or reduced-aircraft-time training as operational experience, simulator technology and supporting evidence develop.
- Any future proposal for powered-lift ZFTT or reduced-aircraft-time training should be considered separately and supported by an appropriately qualified flight simulation training device; approved Operational Suitability Data; sufficient operational and training-effectiveness evidence; robust competency-based assessment standards; and a type-specific training-system safety case. One response highlighted the importance of ensuring that eVTOL training can be completed using a single set of controls.

CAA view: We will retain the existing provisions of FCL.730.A without amendment. We acknowledge the support for the proposed approach to retaining existing provisions relating to Zero Flight Time Training (ZFTT) for powered-lift aircraft. At present, operational experience with powered-lift aircraft remains limited, and there is insufficient evidence to demonstrate that ZFTT arrangements can consistently provide an equivalent level of safety across the range of powered-lift designs.

We recognise that advances in simulation technology and competency-based training methodologies may, in the future, support alternative training approaches for certain powered-lift aircraft. However, respondents also highlighted the diversity of powered-lift designs, flight-control architectures and operational concepts currently under development. In the absence of sufficient operational and training-effectiveness data, we consider it premature to introduce generic ZFTT provisions into the licensing framework.

We therefore consider that pilots should continue to gain experience in the aircraft, in addition to any simulator-based training, when qualifying for powered-lift operations.

We note stakeholder comments regarding the potential future use of ZFTT and reduced-aircraft-time training. The CAA remains open to future proposals where supported by appropriate evidence. Any future consideration of ZFTT or similar training arrangements would be subject to a robust demonstration of equivalent safety, including consideration of simulator fidelity, operational experience, training effectiveness data, approved Operational Suitability Data, competency-based assessment standards and an appropriate type-specific safety case.

This approach maintains flexibility for future innovation while ensuring that any departure from conventional aircraft training requirements is supported by a sufficient body of evidence and safety assurance.

Section 3 - Helicopter Type Ratings: FCL.720.H (Question 8)

We set out our position that, unless otherwise determined in the operational suitability data, the existing experience requirements and prerequisites for the issue of 'Type Ratings - Helicopter' provide a suitable licensing platform for aircraft defined as multi-copters (previously termed non-conventional helicopters), and that we propose to use this existing framework. We noted that this will remain an area subject to review as OEMs of such aircraft provide additional information to the CAA.

Following this consultation we have amended our proposed approach to use the term 'Multi-copter as a sub-set of Helicopter in lieu of the term 'Non-Conventional Helicopter'. We believe this term will appropriately capture new designs coming under the category of Helicopter. This amended approach is detailed in Part A of this document.

We asked: Do you agree or disagree with the proposed approach to FCL.720H Experience requirements and prerequisites for the issue of type ratings — helicopters?

Summary of responses: We received 9 responses to this question. Of these, 4 respondents strongly agreed and 2 respondents somewhat agreed. One respondent neither agreed nor disagreed, and one respondent somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- The existing helicopter type-rating framework provides a practical and proportionate starting point for establishing type-rating requirements for multicopters.
- Recognition of helicopter experience applicable to vertical take-off and landing, hovering, low-speed flight, and autorotation or equivalent emergency procedures dependent on aircraft configuration, was considered relevant.
- Existing helicopter experience should be supplemented by aircraft-specific training addressing novel systems, flight-control logic, propulsion arrangements, handling characteristics and failure modes.
- Aircraft-specific differences could be identified and addressed through the applicable Operational Suitability Data and type-rating training program.

Comments opposing the proposals highlighted the following reasons:

- One response somewhat disagreed but did not provide an explanation. One responded strongly disagreed. In order not to duplicate responses we have summarised these comments once under question 2.

Other comments raised include:

- Some light powered-lift aircraft may be designed to be simpler to operate than conventional rotorcraft. Overly prescriptive experience requirements could therefore create unnecessary barriers to entry.

- Conventional helicopter competencies should not automatically be treated as transferable to every non-conventional helicopter or multirotor configuration.
- Conventional helicopter training for vortex ring state may not transfer directly to aircraft equipped with multiple lift units.
- In multirotor aircraft, vortex ring state may develop differently across the propulsion system. Its onset cues, aircraft response and appropriate recovery procedure may depend on the particular configuration, flight-control system and propulsion architecture.
- The applicable Operational Suitability Data for flight crew should identify whether aircraft-specific training is required for the recognition, avoidance and recovery of vortex ring state.

CAA view: We will retain FCL.720.H, with amendments only to the extent necessary to reflect the introduction of multicopters as a sub-category of helicopter within the licensing framework.

We consider that the existing helicopter type-rating framework provides an appropriate basis for the qualification of multicopter pilots. Many of the competencies associated with vertical flight operations remain relevant across conventional helicopter and multicopter designs. At the same time, we recognise that emerging multicopter aircraft may incorporate novel propulsion systems, flight-control architectures and handling characteristics which require aircraft-specific training.

We do not consider it necessary to introduce a separate multicopter type-rating framework at this stage. The existing provisions of FCL.720.H already provide flexibility to accommodate differences between aircraft types. In particular, FCL.720.H(c) establishes experience requirements for multi-engine helicopter type ratings while the provision recognises the role of Operational Suitability Data (OSD) in determining appropriate prerequisites and training requirements where a standard approach may not be suitable.

This approach allows relevant prior helicopter experience to be recognised while ensuring that any aircraft-specific competencies, training requirements and operational considerations are identified through the OSD process and addressed within the applicable type-rating course. We consider this to be a proportionate approach that supports innovation in multicopter design while maintaining an appropriate level of safety and consistency within the existing helicopter licensing framework.

Section 4 - Powered-lift Type Ratings: FCL.720.PL (Question 9)

Consultation proposal: We set out detailed proposals for the experience requirements and prerequisites for licence holders applying for the first issue of a powered-lift type rating. We proposed amendments to recognise both multi-pilot and single-pilot operations and to align prerequisite requirements to the type of operation being conducted. Specifically, we set out requirements for three categories of applicant - pilots of

aeroplanes, pilots of helicopters, and pilots qualified to fly both - with distinct prerequisites for multi-pilot and single-pilot powered-lift operations in each case. These include requirements for licence type, theoretical knowledge, multi-crew cooperation (MCC) certification (for multi-pilot operations), minimum flight hours as PIC, cross-category flight instruction hours, and an Instrument Rating for IFR operations. We explained that experience requirements are determined by the OSD established in accordance with Annex I (Part-21) to Regulation (EU) No 748/2012, and invited submissions on changes supported by datasets to the hours-based approach.

We asked: Do you agree or disagree with the proposed approach to FCL.720PL Experience requirements and prerequisites for the issue of type ratings — powered-lift aircraft?

Summary of responses: We received 12 responses to this question. Of these, 3 respondents strongly agreed and 3 respondents somewhat agreed. One respondent neither agreed nor disagreed, and no respondents somewhat disagreed. 5 respondents strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Powered-lift may combine characteristics of aeroplanes and helicopters. Requiring cross-category experience was viewed as a reasonable way of developing a sufficiently broad skill base before commencing a powered-lift type-rating course.
- Aeroplane pilots may require training relevant to vertical flight, while helicopter pilots may require training relevant to wing-borne flight and transition between different flight regimes.
- Cross-category experience may provide useful experience, provided it is supplemented by training appropriate to the particular aircraft.
- The requirements should be supported by competency-based assessments. and reflect both the operation of the aircraft and the technology available to support pilot decision-making.

Comments opposing the proposals highlighted the following reasons:

- Prescribed minimum experience in both aeroplanes and helicopters may not be relevant to every powered-lift design.
- Requiring an aeroplane pilot to complete conventional helicopter flight time, or a helicopter pilot to complete conventional aeroplane flight time, would not necessarily improve competence to operate a highly automated powered-lift aircraft.
- The relevance of cross-category experience depends on the aircraft's configuration, control architecture, automation, handling characteristics and operating procedures.

- Concerns were raised that fixed cross-category requirements could create negative transfer of skills by reinforcing control techniques, handling responses or operating assumptions that do not apply to the powered-lift aircraft concerned.
- A requirement for 40 hours of helicopter experience was considered inappropriate for powered-lift with control architecture aligned to conventional aeroplanes.
- Eligibility requirements for entry into an initial powered-lift type-rating course should be distinguished from aircraft-specific qualification and training requirements.
- Fundamental eligibility requirements should be established transparently and consistently in regulation, rather than determined on a type-by-type basis through Operational Suitability Data.
- The applicable Certification Specifications for Operational Suitability Data, Flight Crew Data (CS-FCD), were not considered to provide sufficiently clear and objective criteria for determining pre-entry experience or awarding credit against the proposed requirements.
- Reliance on individual OSD assessments could result in case-by-case decisions and inconsistent outcomes between aircraft designs and applicants.
- Prescribed cross-category hour requirements should be removed and competency gaps from previous licences should be identified and addressed through the powered-lift type-rating course, then validated during the proficiency check.
- It was suggested that the UK requirements should align more closely with the ICAO Annex 1 transitional framework, under which holders of aeroplane or helicopter licences can obtain a powered-lift type rating through an approved training programme addressing powered-lift-specific competencies.

Other comments raised include:

- A single set of prerequisite experience requirements may not be appropriate across the full range of powered-lift aircraft, particularly given the diversity of emerging designs.
- Requirements developed for larger commercial powered-lift operations may not be suitable for lighter or less complex aircraft.
- Overly prescriptive prerequisites could create unnecessary barriers to entry, particularly for private pilots and emerging sectors of powered-lift aviation.
- Future licensing frameworks should support proportionate progression routes, including potential ab initio pathways.
- Aircraft-specific transition characteristics and associated competencies may vary significantly between powered-lift designs and should be reflected appropriately in training and qualification requirements.
- There were differing views on the role of OSD. Some respondents considered OSD the appropriate mechanism for defining prerequisites on a type-specific basis,

whereas others favored establishing core eligibility requirements in regulation with OSD limited to identifying aircraft-specific training and checking requirements.

- Respondents requested clearer distinction between regulatory eligibility requirements, aircraft-specific prerequisites, competencies addressed during type-rating training, and those demonstrated during the proficiency check.

CAA view: We will amend FCL.720.PL to remove the proposed prescriptive cross-category flight-hour requirements and to introduce operationally dependent instrument rating (IR) and multi-crew cooperation (MCC) requirements.

We recognise that defined prerequisite experience requirements can provide clarity and consistency for applicants and training providers. Consultation responses highlighted that prescribing minimum aeroplane and helicopter experience based on conventional aircraft categories may not be appropriate for the wide range of powered-lift designs currently under development. Aircraft configurations, control architectures, levels of automation, handling characteristics and operating concepts vary significantly, meaning that experience requirements relevant to one powered-lift design may be of limited value to another.

We acknowledge concerns that prescriptive cross-category experience requirements could, in some cases, introduce the potential for negative transfer of skills where learned responses or operating techniques are not applicable to the powered-lift aircraft concerned.

Accordingly, we consider that a flexible, aircraft-specific approach is more appropriate at this stage of industry development. For the initial issue of a powered-lift type rating, prerequisite experience, training credits and any additional qualification requirements will be determined through the Operational Suitability Data (OSD) established in accordance with Part-21. This approach will allow requirements to be tailored to the characteristics and operational context of each powered-lift design while maintaining an appropriate level of safety.

As powered-lift designs mature and greater commonality emerges across aircraft types, we may consider whether standardised prerequisite experience requirements are appropriate for groups of aircraft sharing common design and operational characteristics. At present, we consider that an OSD-based approach provides the necessary flexibility to support innovation while ensuring that type-rating prerequisites remain relevant to the aircraft concerned.

[FCL.725.PL - Flight Instruction for powered-lift Type Ratings \(Question 10\)](#)

Consultation proposal: We set out that flight instruction for a powered-lift type rating must be completed in both the aircraft and a suitably qualified Flight Simulation Training Device (FSTD) representing the aircraft. We explained that we do not propose to amend

this provision, noting that FSTD qualification is set out in the relevant requirements of Part-ARA and Part-ORA, and that this area will be considered further as a consequence of innovation and training methodology. We noted that OEMs will propose the amount of time spent within a simulator or other training device and the practical elements on the aircraft within their OSD-FC.

We asked: Do you agree or disagree with the proposed approach to FCL.725.PL Flight instruction for the issue of type ratings — powered-lift aircraft?

Summary of responses: We received 12 responses to this question. Of these, 4 respondents strongly agreed and 4 respondents somewhat agreed. One respondent neither agreed nor disagreed, and one respondent somewhat disagreed. 2 respondents strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Training should be tailored to the specific powered-lift type rather than treated as a generic extension of aeroplane or helicopter training.
- Aircraft-specific training is required because powered-lift may have unique handling qualities and type specific procedures.
- Combined use of the aircraft and suitably qualified flight simulation training devices (FSTDs) could provide a robust basis for safe and effective training, particularly for failure conditions that cannot be practiced safely in the aircraft.
- The allocation of training between the aircraft, a qualified FSTD and any other approved training device should reflect the characteristics of the aircraft; competencies to be demonstrated, capability, and the fidelity of the training devices.

Comments opposing the proposals highlighted the following reasons:

- Mandating training in both the aircraft and a flight simulation training device in every case would be overly prescriptive and would not adequately account for the diversity of powered-lift designs and operating concepts.
- A requirement for in-aircraft instruction may be impractical for powered-lift aircraft designed for single-pilot operation with a single pilot station and one set of controls, potentially creating pressure for manufacturers to develop dedicated training variants.
- The framework should recognise the potential for extensive or fully simulator-based training and checking where simulator fidelity, supporting evidence and mission-oriented training demonstrate an equivalent level of safety.
- Training requirements should focus primarily on the achievement of defined competencies rather than the accumulation of prescribed flight hours.

- Training methodology and type-rating prerequisites should be determined through the Operational Suitability Data process rather than being prescribed uniformly in regulation.

Other comments raised include:

- Clarification was requested on the mechanism the CAA would use to determine whether a pilot is adequately qualified where an aircraft manufacturer proposes that no in-aircraft flight time is necessary.
- The framework should remain flexible so that the balance between aircraft and simulator training can evolve as operational evidence, simulation technology and training methodologies mature.
- Flight simulation training device qualification for powered-lift aircraft should cover more than the nominal transition trajectory.
- For aircraft involving the tilting or reorientation of rotors, wings or other lift or thrust devices, the simulation model should represent changing control effectiveness; control allocation; aerodynamic coupling; actuator response; asymmetric conditions; and relevant degraded or failure conditions.
- Accurate simulation of degraded and failure conditions was regarded as particularly important where those conditions could not safely be trained in the aircraft.

CAA view: The CAA has considered the feedback received and proposes to retain FCL.725.PL as consulted upon. The CAA considers that the appropriate balance between training conducted in the aircraft and training conducted in a suitably qualified Flight Simulation Training Device (FSTD) should be determined through the Operational Suitability Data (OSD) process established under Part-21. The OSD, developed by the aircraft manufacturer and approved by the CAA, will define the training footprint required for each powered-lift type, including the use of aircraft, FSTDs and any other approved training devices.

The CAA acknowledges stakeholder views that a prescriptive requirement for in-aircraft training may not be appropriate for all powered-lift designs, particularly where aircraft are intended for single-pilot operation and may incorporate a single pilot station or a single set of controls. However, the CAA considers that any training methodology proposed must demonstrate equivalent training outcomes and assessment standards, with no reduction in the level of competence required for the issue of a type rating.

The CAA recognises that advances in simulation technology may support an expanded role for FSTDs in powered-lift training. Where simulator fidelity, supporting evidence and operational experience demonstrate an equivalent level of safety, greater reliance on FSTDs may be feasible. The regulatory framework provides sufficient flexibility for training methodologies to evolve alongside technological developments while maintaining appropriate safety standards.

The CAA considers that qualification standards for powered-lift FSTDs should be capable of addressing the full operational and failure environment of the aircraft. This is particularly important for degraded and failure conditions that cannot be safely or practically demonstrated in the aircraft. For powered-lift designs involving rotating, tilting or reorienting lift and thrust devices, the simulation should adequately represent the associated aircraft handling characteristics and system behaviour.

In line with advancements in innovation and technology the CAA recognises that modern powered-lift aircraft may employ fly-by-wire architectures and control interfaces that differ significantly from those found in traditional aeroplanes and helicopters. Controller interfaces are not uncommon in drones, robotics, military systems and some aerospace applications. While some powered-lift designs may be intended for single-pilot operation with a single pilot station, manufacturers may elect to enable use of additional pilot controls or training provisions where this facilitates instruction, assessment and regulatory compliance.

Subpart I - Additional Ratings: Night Rating (Question 11)

Consultation proposal: We set out our proposal to amend Subpart I and associated provisions, subject to FCL.810 Night Rating, to the extent necessary to enable licence holders to exercise night privileges on powered-lift aircraft when a type rating has been endorsed on the licence in accordance with FCL.720.PL. We explained that CPL and ATPL licence holders hold night privileges, but PPL licence holders require an additional night rating to fly at night. We set out that the proposed approach is intended to facilitate alignment of prerequisite experience requirements and recognise powered-lift flight time for cross-crediting.

We asked: Do you agree or disagree with the proposed changes to FCL.810 Night rating?

Summary of responses: We received 10 responses to this question. Of these, 7 respondents strongly agreed and one respondent somewhat agreed. One respondent neither agreed nor disagreed, and no respondents somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Applying comparable night qualification standards across aeroplanes, helicopters and powered-lift aircraft would promote consistency in licensing and training requirements.
- The proposal would maintain alignment with existing operational and training standards while accommodating the particular characteristics of new VTOL aircraft.
- Powered-lift night operations may present additional challenges, including vertical take-off and landing in reduced visual conditions; transition between vertical and wing-borne flight; approach-path management; and aircraft energy monitoring.

- Explicitly extending or adapting night-rating requirements to powered-lift aircraft would ensure that pilots receive relevant training before exercising night privileges, rather than relying solely on experience obtained in conventional aeroplanes or helicopters.
- Relevant night-flying experience and qualifications obtained in aeroplanes or helicopters should be appropriately cross-credited when a pilot seeks night privileges on a powered-lift aircraft.
- Pilots should not be required to repeat training for night-flying competencies they have already demonstrated. Additional training should be aircraft-specific identified through the OSD.

One response strongly disagreed with the proposal but did not provide explanation.

Other comments raised include:

- Not all powered-lift aircraft will necessarily be designed or approved for night operations.

CAA view: We will amend FCL.810 (Night Rating) and associated provisions to enable the exercise of night privileges on powered-lift aircraft where appropriate. We consider that applying a common regulatory framework for night flying across aeroplanes, helicopters and powered-lift aircraft promotes consistency within the personnel licensing system while ensuring that pilots receive the training necessary to operate safely at night.

We agree with respondents that pilots should receive credit for relevant night-flying qualifications and experience already gained in aeroplanes or helicopters and should not be required to repeat training for competencies previously demonstrated. However, powered-lift aircraft may introduce aircraft-specific operational considerations and competencies that are not addressed through conventional aeroplane or helicopter night training. Accordingly, any additional training, checking or qualification requirements necessary to support night operations on a particular powered-lift aircraft will be identified through the Operational Suitability Data (OSD) process. This approach provides an appropriate balance between recognising existing pilot qualifications, maintaining safety, and accommodating the diversity of powered-lift aircraft designs. The amended provisions will ensure that night privileges apply only where the powered-lift aircraft is appropriately approved for night operations.

Subpart J - Instructors (Question 12)

We set out that we do not propose amendments to Subpart J - Instructors, noting that the issue of a specific certificate granting privileges for flight instruction and examination is possible where special conditions arise, including the introduction of a new aircraft type within the United Kingdom. We explained that due to the wide range of types and variations in characteristics among new types of VTOL aircraft, this area will be reviewed

on submission by OEMs of their OSD-FC, and that instructors within the OEM will prepare the outline of the learning objectives for both theoretical and practical training.

We asked: We invite views on the proposed approach to Subpart J - Instructors?

Summary of responses: We received 11 responses to this question. Of these, 6 respondents strongly agreed and 2 respondents somewhat agreed. 1 respondent neither agreed nor disagreed, and 1 respondent somewhat disagreed. 1 respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Instructors should possess aircraft-specific knowledge and competence in areas such as transition flight; automation and flight-control laws; energy management; aircraft-specific systems; and normal and emergency procedures.
- The Operational Suitability Data (OSD-FC) process was viewed as an appropriate mechanism for defining instructor prerequisites, privileges, learning objectives and aircraft-specific competency requirements.
- The existing framework, including the use of special condition authorisations where appropriate, was considered capable of supporting the introduction of a new aircraft type.

Comments opposing the proposals highlighted the following reasons:

- Powered-lift aircraft present unique challenges because they effectively introduce a new aircraft category with novel operational characteristics.
- The existing instructor framework may require greater flexibility during the initial introduction period when there are limited numbers of qualified instructors.
- Conventional instructor concepts may not be fully suitable for powered-lift aircraft certified for single-pilot operation with a single pilot station and a single set of controls.

Other comments raised include:

- During initial entry into service, instructors may need to perform a hybrid role combining characteristics of both a Type Rating Instructor (TRI) and a Synthetic Flight Instructor (SFI).
- For aircraft with a single pilot station and single set of controls, instructors may be better suited to acting as mentor pilots or safety pilots rather than providing conventional dual-control instruction.
- One response observed that aircraft manufacturers and OEM-employed training pilots may initially represent the most qualified instructor resource and encouraged the CAA to recognise that experience appropriately.

CAA view: We will retain the existing provisions of Subpart J (Instructors) without amendment. We consider that the current instructor framework provides sufficient flexibility to support the introduction of powered-lift aircraft and the development of applicable training programmes. The existing provisions, together with the use of special condition authorisations where appropriate, can accommodate the phased introduction of new aircraft types and the development of instructor experience within the sector.

We recognise that some powered-lift aircraft may present training challenges that differ from those associated with conventional aeroplanes and helicopters, particularly where aircraft are certificated for single-pilot operation and equipped with a single pilot station or a single set of controls. We consider that aircraft-specific considerations are best addressed through the Operational Suitability Data (OSD) process, which can define instructor competencies, training methodologies, and additional requirements necessary for new aircraft type.

We acknowledge stakeholder feedback regarding instructional approaches during initial entry into service and consider the existing framework provides sufficient flexibility to accommodate such arrangements approved through the relevant regulatory processes. We do not consider additional instructor categories or powered-lift-specific instructor provisions necessary at this stage. Retaining the existing framework, supplemented by aircraft-specific requirements established through OSD, provides a proportionate and adaptable approach that supports innovation while maintaining appropriate safety oversight.

Appendices to Annex I

Appendix 8 - Cross-Crediting of the IR Part of a Class or Type Rating Proficiency Check (Question 13)

Consultation proposal: We invited submissions on changes that may be required to Appendix 8 to provide equivalence in the powered-lift category to aeroplane and helicopter categories. We explained that the proposed changes would support the cross-crediting of the IR part of a type rating proficiency check where required for IFR operations for powered-lift aircraft.

We asked: Do you agree or disagree with the proposed changes to Appendix 8 Cross-crediting of the IR part of a class or type rating proficiency check?

Summary of responses: We received 11 responses to this question. Of these, 5 respondents strongly agreed and 4 respondents somewhat agreed. No respondents neither agreed nor disagreed, and one respondent somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Multiple responses specifically supported the cross-crediting of aeroplane and helicopter instrument rating privileges subject to appropriate safeguards.
- Cross-crediting of instrument rating (IR) competencies is appropriate where pilots have already demonstrated equivalent instrument flying skills through an approved class or type rating proficiency check.
- The proposal would avoid unnecessary duplication of testing, training and administrative burden while maintaining the required level of safety and pilot competence.
- The approach promotes consistency across aircraft categories by recognising equivalent instrument qualifications and experience where the underlying competencies are comparable.
- Efficient and streamlined qualification pathways will be important in supporting the growth of the powered-lift sector while maintaining appropriate regulatory oversight.

Comments opposing the proposals highlighted the following reasons:

- One response considered it was important that pilots complete a cross-country flight in a powered-lift aircraft as part of obtaining powered-lift category and instrument rating privileges.
- Instrument competencies demonstrated solely in another aircraft category may not fully address powered-lift-specific operational experience requirements.
- One responded strongly disagreed. In order not to duplicate responses, we have summarised these comments once under question 2.

Other comments raised include:

- Aircraft-specific risks and operational characteristics, including transition flight, approach, missed approach and energy-management tasks, should be considered before granting credit.
- Drafting or guidance was requested so that industry can better understand the practical operation of the proposed crediting arrangements.

CAA view: We will amend Appendix 8 to provide appropriate credit for instrument rating privileges and competencies already demonstrated in other aircraft categories, where this can be achieved without adversely affecting safety.

We consider that pilots should not be required to repeat instrument training or testing where equivalent competencies have already been demonstrated through an approved instrument rating qualification and associated proficiency checks. Recognising these competencies supports a proportionate approach, reduces unnecessary duplication and facilitates progression into powered-lift operations while maintaining the required level of pilot competence.

We recognise that powered-lift aircraft may present aircraft-specific operational considerations that are not addressed through conventional aeroplane or helicopter instrument training. These may include transition flight, energy management, automation, flight-control characteristics and specialised instrument procedures. Accordingly, crediting arrangements will be limited to common instrument-flying competencies. Aircraft-specific instrument procedures, training and checking requirements will be determined through the applicable Operational Suitability Data (OSD), type-rating training programme and, where necessary, additional assessment or proficiency checking.

Appendix 9 - Training, Skill Test and Proficiency Check (Question 14)

Consultation proposal: We drew attention to Appendix 9 in the case of skill tests or proficiency checks for type ratings applicable to future VTOL operations. We invited submissions on changes that may be required, based on datasets available to OEMs, with particular reference to flight test tolerance and the content of the training, skill test and proficiency check across all sections (preflight preparations; flight manoeuvres and procedures; normal and abnormal operations; abnormal and emergency procedures; instrument flight procedures; and optional equipment).

We asked: We invite views on the proposed approach to Appendix 9 Training, skill test and proficiency check for MPL, ATPL, type and class ratings, and proficiency check for IRs?

Summary of responses: We received 9 responses to this question. Of these, 4 respondents strongly agreed and 2 respondents somewhat agreed. One respondent neither agreed nor disagreed, and one respondent somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Training and checking for powered-lift aircraft should be integrated into the existing Appendix 9 framework while incorporating aircraft-specific content where required.
- Existing aeroplane and helicopter assessment standards alone would not be sufficient because powered-lift aircraft may involve: transition between flight regimes; automation management; energy management; aircraft-specific flight-control systems; and unique emergency procedures.
- A structured Appendix 9 framework would promote consistency across training organisations while still allowing aircraft-specific requirements to be tailored through the applicable type-rating programme and Operational Suitability Data (OSD).

Comments opposing the proposals highlighted the following reasons:

- Aircraft configuration transitions be treated as distinct competencies, with dedicated training and assessment for normal, abnormal and failed transition scenarios.

- The consultation presents an opportunity to develop a more consistent, competency-based assessment framework across all categories.
- Aircraft-specific requirements should be driven by approved Operational Suitability Data rather than relying solely on generic regulatory provisions.
- One responded strongly disagreed. In order not to duplicate responses, we have summarised these comments once under question 2.

Other comments raised include:

- Configuration conversion or transition between different lift and thrust configurations should be treated as a distinct competency rather than being addressed only through generic take-off, landing or engine-failure exercises.
- Depending on the aircraft design, training and checking should address: normal configuration conversion; monitoring and completion of transition; aborted transitions; safe reversion procedures; and representative failures such as tilt-system asymmetry, configuration disagreement and degraded flight-control operation.
- The relevant scenarios should be identified through the Operational Suitability Data for Flight Crew (OSD-FC) and the aircraft-level safety assessment.
- Aircraft-specific assessment items should recognise differences in powered-lift designs. For example, some powered-lift aircraft may not have an autorotation capability, and associated training or checking requirements should apply only where the aircraft is designed to perform those manoeuvres.
- One response encouraged the development of a harmonised, competency-based Appendix 9 structure and offered to support further regulatory development.

CAA view: We will amend Appendix 9 to establish training, skill testing and proficiency checking requirements for powered-lift aircraft, including the assessment of competencies that are unique to new VTOL aircraft.

We agree with respondents that powered-lift aircraft may introduce operational and handling characteristics that are not fully addressed by existing aeroplane or helicopter assessment standards. These may include transition between flight regimes, management of highly automated systems, aircraft-specific flight-control architectures, energy management and novel emergency procedures. The assessment framework should recognise existing competencies and powered-lift specific competencies.

We recognise the importance of ensuring that aircraft-specific competencies are addressed in a manner proportionate to the aircraft design. Appendix 9 will establish the framework for training, skill testing and proficiency checking; the applicable Operational Suitability Data (OSD) will identify specific competencies, procedures and assessment scenarios applicable to individual aircraft types. This approach will enable transition-related competencies and other aircraft-specific operational considerations to be assessed

where relevant, ensuring that training and checking requirements remain aligned with the design, certification basis and operational characteristics of the aircraft.

We acknowledge feedback around the applicability of competency-based assessment principles wherever practicable. Amendments to Appendix 9 will be developed to support consistency, proportionality and harmonisation across aircraft categories, retaining flexibility to accommodate the diversity of powered-lift designs where feasible.

Annex VI - Approved Training Organisations (ATOs) (Question 15)

Consultation proposal: We set out that amendments are not currently being proposed to training environments and course provision requirements for Approved Training Organisations (ATOs). We explained that training courses are normally the output of the training outcomes stated within the OSD-FC, informed by training undertaken during the certification of the aircraft, and that the information to establish the basis of the syllabus for both theoretical and practical training can only be obtained towards the end of the certification process.

We asked: Do you agree or disagree with the proposed approach to Subpart ATO Specific requirements related to Approved Training Organisations (ATOs)?

Summary of responses: We received 11 responses to this question. Of these, 8 respondents strongly agreed and one respondent somewhat agreed. 2 respondents neither agreed nor disagreed, and no respondents somewhat disagreed. No respondents strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- ATOs providing powered-lift training should demonstrate appropriate capability, including: suitably qualified instructors; appropriate training devices and simulators; aircraft-specific training courses and material; and procedures for managing novel operational and training risks.
- Powered-lift aircraft are likely to require specialist training beyond conventional aeroplane or helicopter syllabi.
- Existing aeroplane and helicopter instructors should be able to transition into powered-lift instructional roles through appropriate conversion pathways, helping to support workforce development and industry growth.
- The existing framework can effectively support powered-lift training provided that aircraft-specific requirements are addressed appropriately.

Comments opposing the proposals highlighted the following reasons:

- No responses explicitly disagreed or raised substantive objections to the proposed approach.

Other comments raised include:

- The CAA should ensure that smaller training organisations are able to operate within a proportionate and economically viable regulatory environment.
- The availability of accessible and affordable training will be critical to the long-term growth of the powered-lift sector.
- Consideration should be given to how the ATO framework will support future ab initio powered-lift training pathways as the market matures.

CAA view: We will retain the existing provisions of Subpart ATO without amendment. We consider the existing ATO framework sufficiently flexible to accommodate powered-lift aircraft and provide an appropriate basis for maintaining consistent training standards, organisational oversight and competency assurance. The existing framework enables the approval of aircraft-specific training courses, instructor qualifications, training devices and associated procedures necessary to support the introduction of new aircraft types.

We consider powered-lift will require training which reflects their specific design, and operational characteristics. Aircraft-specific requirements will be addressed through approved training programmes, Operational Suitability Data (OSD) and associated regulatory approvals rather than through changes to the ATO framework.

We recognise the importance of ensuring that regulatory requirements remain safety-focused and proportionate, and do not create unnecessary barriers for training providers as the powered-lift sector develops.

We acknowledge feedback on future ab initio powered-lift training pathways. While outside the scope of the current proposals, we acknowledge the potential importance as the sector matures. Future licensing and training needs will remain under review as powered-lift operations become established.

We consider that retaining the existing ATO framework provides an appropriate and proportionate approach while preserving the flexibility needed to support innovation and future development within the powered-lift sector..

Air Navigation Order

Consultation proposal: We invited comments and feedback on provisions of the Air Navigation Order (ANO) 2016 that may be affected by innovation, with particular regard to Part 6 (Aircrew) and Schedule 8 (Flight Crew of Aircraft - Licences, Ratings, Qualifications and Maintenance of Licence Privileges). We explained that amendments to the ANO may be needed to support consistency and alignment with changes proposed in the Aircrew Regulation and to provide equivalence at national level, supporting the delivery of a pilot licensing pathway enabling commercial and private pilot licence holders to fly new types of VTOL aircraft safely.

We asked: Do you agree or disagree with the proposed approach to amendments to The Air Navigation Order 2016?

Summary of responses: We received 9 responses to this question. Of these, 6 respondents strongly agreed and one respondent somewhat agreed. One respondent neither agreed nor disagreed, and no respondents somewhat disagreed. One respondent strongly disagreed.

Comments in support of the proposals highlighted the following reasons:

- Amendments to the Air Navigation Order (ANO) 2016 are necessary to accommodate powered-lift aircraft and other new VTOL aircraft categories within the UK aviation regulatory framework.
- Updating the ANO would provide the legislative basis required to support the safe integration of powered-lift aircraft into UK aviation.
- The proposed amendments would improve legal clarity by ensuring that powered-lift aircraft and non-conventional helicopters are appropriately recognised within the wider regulatory framework.
- Aligning the ANO with the proposed flight crew licensing changes would help avoid ambiguity or regulatory gaps between licensing requirements, operational rules and national aviation legislation.
- The amendments provide an important foundation for the development of future licensing, operational and airworthiness requirements for powered-lift aircraft.
- Consistency between the ANO and the Aircrew Regulation was considered important to ensure a coherent regulatory framework for training, licensing and operations.
- Multiple responses considered the proposals as a necessary enabling step for the introduction of new VTOL aircraft into UK aviation.

Comments opposing the proposals highlighted the following reasons:

- One response strongly disagreed with the proposed amendments without offering further detail.

Other comments raised include:

- ANO amendments should recognise that the powered-lift sector is likely to include a diverse range of aircraft, from commercial passenger-carrying operations to light aircraft used for personal ownership, recreational flying and flight training.
- Respondents were concerned that the consultation and proposed framework appeared primarily focused on larger transport-category powered-lift aircraft.
- The legislative framework should remain sufficiently flexible to accommodate future developments in aircraft design, complexity, performance and operational use.

- Requirements designed for commercial transport operations should not automatically be applied across the entire powered-lift sector.
- Future regulatory development should continue to distinguish between:
 - commercial powered-lift operations; and
 - light powered-lift aircraft used for private, recreational and training purposes.
- Responses emphasised that aircraft-specific training, experience and competency requirements should remain within:
 - approved Operational Suitability Data (OSD);
 - type-rating requirements; and
 - applicable operational regulations, rather than being embedded directly within primary legislation.

Amendments to the Air Navigation Order 2016 were viewed as a necessary legislative step to enable the safe integration of powered-lift aircraft and other VTOL aircraft into the UK aviation system, where alignment between the ANO and the Aircrew Regulation would improve legal clarity and provide a coherent basis for future regulatory development.

Wider comments focused on ensuring that future implementation remains sufficiently flexible and proportionate to accommodate both commercial transport-category powered-lift aircraft and the emerging light powered-lift sector. Responses emphasised that detailed aircraft-specific competency, training and experience requirements should continue to be managed through Operational Suitability Data and type-rating requirements rather than primary legislation.

CAA view: We will assess the need for amendments to the Air Navigation Order, and make a recommendation to DfT, to the extent necessary to provide consistency and alignment at a national level with changes proposed to the Aviation Rules.

ANNEX 1

Abbreviations

AAM – Advanced Air Mobility

AMC – Alternative Means of Compliance

AIP – Aeronautical Information Publication

ATM – Air Traffic Management

CAMO – Continuing Airworthiness Management Organisations

CAT – Commercial Air Transport

CMPA – Complex Motor-Powered Aircraft

CS FCD – Certification Specific Flight Crew Data

DfT – Department for Transport

EASA – European Union Aviation Safety Agency

GM – Guidance Material

ICAO – International Civil Aviation Organisation

IFR – Instrument Flight Rules

ISMS – Information Security Management System

MCC – Multi-Crew Cooperation

NASP – National Aviation Security Programme

NAA - National Aviation Authorities

OEM – Original Equipment Manufacturer

OSD – Operational Suitability Data

PIC – Pilot in Command

PPL – Private Pilot's License

RFFS – Rescue and Fire Fighting Service

SMS – Safety Management System

VFR – Visual Flight Rules

VTOL – Vertical Take-off and Landing

ANNEX 2

Summary of Questions

Question 1: Do you agree or disagree with the proposed changes to FCL.010 Definitions with reference to personnel licensing of new VTOL aircraft? Please explain your answer.

Question 2: Do you agree or disagree with the proposed changes to FCL.205.A PPL(A) - Privileges? Please explain your answer.

Question 3: Do you agree or disagree with the proposed changes to FCL.205.H PPL(H) - Privileges? Please explain your answer.

Question 4: We invite views on the proposed approach to FCL.305 CPL - Privileges and conditions and associated provisions? Please explain your answer.

Question 5: Do you agree or disagree with the proposed changes to FCL.505 ATPL - Privileges and associated provisions? Please explain your answer.

Question 6: Do you agree or disagree with the proposed changes to FCL.600 IR - General and FCL.610 IR - Prerequisites and crediting. Please explain your answer.

Question 7: Do you agree or disagree with the proposed approach to FCL.730A Specific requirements for pilots undertaking a zero flight time type rating (ZFTT) course - aeroplanes? Please explain your answer.

Question 8: Do you agree or disagree with the proposed approach to FCL.720H Experience requirements and prerequisites for the issue of type ratings - helicopters? Please explain your answer.

Question 9: Do you agree or disagree with the proposed approach to FCL.720PL Experience requirements and prerequisites for the issue of type ratings - powered-lift aircraft? Please explain your answer.

Question 10: Do you agree or disagree with the proposed approach to FCL.725.PL Flight instruction for the issue of type ratings - powered-lift aircraft? Please explain your answer.

Question 11: Do you agree or disagree with the proposed changes to FCL.810 Night rating? Please explain your answer.

Question 12: We invite views on the proposed approach to Subpart J - Instructors? Please explain your answer.

Question 13: Do you agree or disagree with the proposed changes to Appendix 8 Cross-crediting of the IR part of a class or type rating proficiency check? Please explain your answer.

Question 14: We invite views on the proposed approach to Appendix 9 Training, skill test and proficiency check for MPL, ATPL, type and class ratings, and proficiency check for IRs? Please explain your answer.

Question 15: Do you agree or disagree with the proposed approach to Subpart ATO Specific requirements related to Approved Training Organisations (ATOs)? Please explain your answer.

Question 16: Do you agree or disagree with the proposed approach to amendments to The Air Navigation Order 2016? Please explain your answer